



Summary Plan Description for Victory Capital Management ("Company") Genomic Life Essential Genomics and Precision Cancer Genomics Employee Paid Program

Plan effective 1/1/2025

This Summary Plan Description (SPD) is required by the Employee Retirement Income Security Act of 1974 (ERISA). This SPD is for Plan 555 sponsored by Victory Capital Management (the "Company") as the Genomic Life Essential Genomics and Precision Cancer Genomics benefit. The Plan Year is 1/1/2025 – 12/31/2025. The Genomic Life Essential Genomics and Precision Cancer Genomics benefit program is paid for by employee premiums.

The Genomic Life™ Benefit

Genomic Life offers a suite of genetic testing, navigation and counseling (**Essential Genomics**) and comprehensive cancer support (**Precision Cancer Genomics**) to understand a member's predisposition to disease, ensure an accurate diagnosis, and obtain tailored treatment and resources, optimizing health and well-being. Genomic Life is not an insurance company; no offered program is an insurance policy.

Genomic Life programs **do not provide payment or reimbursement of payment for treatment costs of any kind.**

Genomic Life is not a medical service provider, does not provide medical treatment or health care clinical services, makes no medical referrals, issues no prescriptions, and provides no related medical advice.

What does coverage cost?

Genomic Life cost is structured as follows:

- Under Age 50: \$18.00 per month for employee or \$36.00 per month for employee and spouse/partner.
- Age 50-64: \$22.00 per month for employee or \$44.00 per month for employee and spouse/partner.
- Age 65+: \$26.00 per month for employees or \$52.00 per month for employees and spouse/partner.
- Deductions are taken as a post-tax.

Eligibility

The programs and services are only available to members residing in the United States.

You are eligible for Essential Genomics and Precision Cancer Genomics if you are an enrolled Member in the Company's medical plan or if your employer has offered the Program to you. Your Spouse or Domestic Partner (if covered under the medical plan or if included in the employer's offering) are also eligible if you pay an additional premium (in accordance with the terms negotiated between your employer and Genomic Life).

Dependent children under the age of 18 are not eligible for Essential Genomics and Precision Cancer Genomics because the American Academy of Pediatrics (AAP) and the American College of Medical Genetics and Genomics (ACMG) has recommended against such predictive genetic testing in minors. Dependent children age 18-26 are also not covered under the Program. However, the clinical navigation team will provide compassionate caregiver support, resources, and education for the enrolled Member, Spouse or Domestic Partner if you or your covered Spouse/Domestic Partner has a dependent child who has been diagnosed with cancer.

How the Essential Genomics benefit works

Participants receive navigation to the genomics that matters to them, offering insights into health and predisposition to disease. Note that dependents under age 18 do not receive genetic tests.

What is covered?

Features of Essential Genomics:

- Genetic Health Screen (GHS)
- Pharmacogenomics (PGx) Test
- Expanded Carrier Screening
- Post-Test Genetic Counseling
- Member Support
- Clinical Action Plan
- Peer-to-Peer Physician Consult
- Clinical Information Line
- Genomic Life Platform

Rooted in engagement and education, Genomic Life accelerates access to genomics to empower individuals to understand their health. Members receive ultra-personalized help navigating to the genomics that matter. The medically actionable genomic-based solutions uncover predisposition to cancer, cardiovascular disease, and drug reactions and produce a genetic baseline. The program harnesses these genetic insights to optimize health and improve outcomes. Some screenings are dependent on clinical appropriateness. Essential Genomics includes:

➤ Genomic Navigation

Members receive trusted answers and expert guidance to navigate a suite of genomic-based solutions that help prevent disease, diagnose a disease accurately, and tailor clinical support and treatment to your unique needs. This service involves a seamless experience when ordering tests, interpreting results, and creating a clinical plan with relevant resources.

➤ Genetic Health Screen

GHS is an accurate, medical-grade DNA test that analyzes genes to identify a predisposition to developing hereditary cancers, cardiovascular diseases, and additional conditions.

➤ Pharmacogenomics (PGx) test

The PGx test analyzes biomarkers on drug-gene interactions and efficacy. It helps uncover how an individual metabolizes and responds to medications. This knowledge helps reduce adverse drug reactions and increase drug response. The Pharmacogenomics test is best suited for those members currently taking 5 or more medications, and/or initiating (or changing) medication for bleeding or clotting disorders, stomach acid, mental health, pain, OR high cholesterol.

➤ **Carrier Screening**

The Carrier Screening examines numerous genes to identify a potential risk of having a child affected by a recessive genetic disease. The carrier screening test is most clinically useful for those considering pregnancy within the next 24 months or expecting a child.

➤ **Post-Test Counseling**

Certified genetic counselors are healthcare professionals with specialized education and training in genetics. They collect family history and assess an individual for risk of an inherited condition. After a genetic test, a genetic counselor can help explain test results, answer questions, and review a clinical action plan that addresses the findings and informs the individual's physician and care plan.

➤ **Clinical Action Plan**

Individuals receive a report based on a test result. If positive, the plan offers clinically relevant knowledge based on the genetic variant(s), condition(s), and recommended next steps

➤ **Peer-to-Peer Physician Consult**

Genetic test experts will work with members' physicians to provide insights and interpret recommendations on tests and treatments.

How the Precision Cancer Genomics benefit works

Genomic Life helps prevent and manage cancer by combining the power of clinical-grade genomic testing with the personalized support of expert cancer care resources. Upon a cancer diagnosis, an employee has access to an oncology navigator who will personalize treatment and receive support and expert resources for shared decision-making.

➤ **Oncology Navigation**

Members receive navigation services comprising high-touch support and high-tech services from a navigator specializing in oncology and patient advocacy. If diagnosed, a dedicated oncology navigator is assigned to the member-patient to create a personalized plan to empower the patient and ensure care continuity.

The navigator advocate will also prepare the patient and attend a clinical appointment via zoom to provide support and insights. Genomic Life will provide oncology navigation for a maximum of two years per cancer diagnosis. This service is only available to participants over the age 18 who have a history of cancer (received successful treatment for cancer, is no longer receiving treatment for cancer, and is cancer free) and or active cancer (currently undergoing diagnostic testing or cancer treatment).

➤ **Diagnostic Inherited Cancer Panel**

The Multi-Cancer Panel analyzes genes associated with hereditary cancers across major organ systems, including:

- breast and gynecologic (breast, ovarian, uterine)
- gastrointestinal (colorectal, gastric, pancreatic)

- endocrine (thyroid, paraganglioma/pheochromocytoma, parathyroid, pituitary)
- genitourinary (renal/urinary tract, prostate)
- skin (melanoma, basal cell carcinoma)
- brain/nervous system
- sarcoma
- hematologic (myelodysplastic syndrome/leukemia)

The panel maximizes diagnostic yield for individuals with a personal or family history of mixed cancers affecting multiple organ systems.

➤ **Comprehensive Genomic Profiling (CGP)**

Upon diagnosis and where appropriate, CGP is one of the most advanced approaches to helping guide cancer treatment. This test analyzes the DNA of the tumor, examining hundreds of cancer-related genes that can help guide oncologists with:

- Targeted treatments
- Immunotherapies
- Clinical Trials

The CGP offers a clinically actionable integrated report that includes tissue and molecular analysis. This evidence-based genetic testing adheres to NCCN guidelines. Testing is subject to treating physician approval based on clinical need and necessity. Report results are delivered back to the treating physician via secured physician portal. Complex cases may require additional time for report.

➤ **Focused Molecular Testing**

The rapid diagnostic guidance system involves assays that include biomarker assessments that evaluate KRAS, BRAF, and EGFR for the presence of activating mutations that guide therapeutic assessment.

➤ **Pharmacogenomics (PGx) Test for Cancer**

This pharmacogenomic test helps providers identify which medications and dosages may work best for oncology patients by analyzing a patient's DNA to predict their response to cancer drugs.

It covers over 350 medications, including chemotherapies, targeted cancer agents, and medications used in supportive care to treat comorbid conditions, including nausea, pain, anxiety, depression, and more.

➤ **Expert Pathology Review**

An additional pathology review helps ensure an accurate diagnosis and informs a personalized treatment plan.

➤ **Peer-to-Peer Physician Consult and Molecular Tumor Board**

Genetic test experts will work with members' physicians to provide insights and interpret recommendations on tests and treatments. Specifically, the team will work with oncologists on how the tumor should be sequenced.

➤ **Clinical Trial Education**

Oncology Navigators offer insight and education regarding clinical trials.

➤ **Member Support, Genomic Education, and Cancer Information Line**

Member and family can talk with Genomic Life as to answer questions about the program, genetic tests, disease-related education (e.g., cancer), disease prevention strategies, or caregiving guidance.

Remember, Genomic Life's services and oncology navigation focus on precision medicine and current cancer guidelines. Genetic testing is subject to treating physician approval based on clinical need and necessity. During the intake process, the clinical team works with members to receive information, releases, and authorizations that may be necessary to access features and services.

When does coverage begin?

Coverage begins at the first of the month following date of hire. If an employee is hired on the 1st of the month coverage will begin that day. The Company is responsible for sending your enrollment request to Genomic Life.

When does coverage end?

- Upon the Company's cancellation of the Genomic Life benefit offering; or
- Upon the employee dropping medical coverage; or
- Upon the end date of the employee's employment with the Company; or
- Upon the end of eligibility for the employee; and
- For spouses (or domestic partners) when the employee's coverage ends.

When coverage ends as described above, all services will end at the end of the month following the event (e.g., the last day of the month following your employment termination), and you will no longer be eligible to continue with the program (unless you have elected COBRA or chosen to port your membership with Genomic Life).

Are the results private?

Your genetic profile is private and protected. We only collect and process personal information for legitimate business purposes and as permitted by applicable laws. Genomic Life does not share identifiable information with Company. Members can access Genomic Life's Privacy Policy at Privacy Policy - Genomic Life <https://www.genomiclife.com/about/policies/>

Reminder: we ask that you take the test that is assigned to you to avoid recollection of saliva samples.

Contact Information

You can contact VCM at humanresources@vcm.com with any questions. Also, if you have any general questions about benefits, please contact Genomic Life by:

844-MYGENOME / 844-694-3666
(Customer Information Call Center)
Monday - Friday 6 a.m. - 6 p.m. PST

Genomic Life
3344 N. Torrey Pines Court, Suite 100
La Jolla, CA 92037

For more information on Genomic Life email navigation@genomiclife.com or visit www.genomiclife.com.

Who is responsible for the program, and will it be changed?

The Company, the sponsor of the Plan, has the general right to amend or terminate the Plan or any component benefit program under the Plan at any time. The Plan may be amended or terminated by a written instrument duly adopted by the Company or any of its delegates. Note, for this purpose, that a Master Services Agreement between the Company and Genomic Life does not make the program insurance or subject to insurance laws of the state. A contract with Genomic Life is how the benefits are provided, but Genomic Life is not the plan administrator or plan sponsor of the program.

What if I have a question regarding benefits?

If you have a question regarding your benefit, please contact Genomic Life directly. If you are unsure of your (or your dependent's eligibility, you should contact the Company directly.

Legal Information

Plan Sponsor

Victory Capital Management
4900 Tiedeman Rd. 4th floor
Brooklyn, OH 44144

Plan Sponsor's Employer Identification Number
13-2700161

Benefits are provided through a contract with Genomic Life.

Genomic Life

3344 N. Torrey Pines Court, Suite 100
La Jolla, California 92037
phone: 844-694-3666
fax: 619-717-6176

Plan Administrator and Named Fiduciary

Victory Capital Management
4900 Tiedeman Rd. 4th floor
Brooklyn, OH 44144
Attention: Human Resources

Agent for Service of Legal Process

Steve Baltas
The James B. Oswald Companies
950 Main Ave
Cleveland, OH 44113
(206) 123-4567

Service for legal process may also be made on the Plan Administrator.

Important Disclaimer

Benefits hereunder are provided pursuant to an insurance contract or governing written plan document adopted by the Company. If the terms of this SPD conflict with the terms of such insurance contract or governing plan document, then the terms of the insurance contract or governing plan document will control, rather than this SPD document, unless otherwise required by law. Please consult with your Company's legal counsel for additional information as Genomic Life is unable to provide legal guidance.

Statement of ERISA Rights

Your Rights

Note that the cafeteria plan and the DCAP component benefit programs are not covered by ERISA and this Statement of ERISA Rights does not apply to these Programs. As a participant in the Plan, you are entitled to certain rights and protections under the Employee Retirement Income Security Act of 1974 (ERISA). 9 ERISA provides that all plan participants shall be entitled to:

- Receive Information About Your Plan and Benefits
- Examine, without charge, at the Plan Administrator's office and at other specified locations, such as worksites, all documents governing the Plan, including insurance contracts, and a copy of the latest annual report (Form 5500 Series), if any, filed by the Plan with the U.S. Department of Labor and available at the Public Disclosure Room of the Employee Benefits Security Administration.
- Obtain, upon written request to the Plan Administrator, copies of documents governing the operation of the Plan, including insurance contracts and copies of the latest annual report (Form 5500 Series) and updated summary plan description (SPD). The Plan Administrator may make a reasonable charge for the copies.
- Receive a summary of the Plan's annual Form 5500, if any is required by ERISA to be prepared, in which case XYZ Corporation, as Plan Administrator, is required by law to furnish each participant with a copy of this summary annual report.

COBRA and HIPAA Rights

Continue health care coverage under certain component benefit programs for yourself, your spouse, or your dependents if there is a loss of coverage under the Plan as a result of a qualifying event. You or your dependents may have to pay for such coverage. Review this SPD and the documents governing the Plan on the rules governing your COBRA continuation coverage rights.

Prudent Actions by Plan Fiduciaries

In addition to creating rights for Plan participants, ERISA imposes duties upon the people who are responsible for the operation of the employee benefit plan. The people who operate your Plan, called "fiduciaries" of the Plan, have a duty to do so prudently and in the interest of you and other Plan participants and beneficiaries. No one, including your employer or any other person, may fire you or otherwise discriminate against you in any way to prevent you from obtaining a Plan benefit or exercising your rights under ERISA.

Enforce Your Rights

If your claim for a welfare benefit is denied or ignored, in whole or in part, you have a right to know why this was done, to obtain copies of documents relating to the decision without charge, and to appeal any denial, all within certain time schedules. Under ERISA, there are steps that you can take to enforce the above rights. For instance, if you request a copy of Plan documents or the latest annual report (Form 5500), if any, from the Plan and do not receive them within 30 days, you may file suit in a federal court. In such a case, the court may require XYZ Corporation, as Plan Administrator, to provide the materials and pay you up to \$110 per day until you receive the materials, unless the materials were not sent because of reasons beyond the control of the administrator. If you have a claim for benefits which is denied or ignored in whole or in part, and if you have exhausted the claims procedures available to you under the Plan, you may file suit in a state or federal court.

If it should happen that Plan fiduciaries misuse the Plan's money, or if you are discriminated against for asserting your rights, you may seek assistance from the U.S. Department of Labor, or you may file suit in a federal court. The court will decide who should pay court costs and legal fees. If you are successful, the court may order the person you have sued to pay these costs and fees. If you lose, the court may order you to pay these costs and fees, for example, if it finds your claim is frivolous.

Assistance With Your Questions

If you have any questions about your Plan, you should contact the Plan Administrator. If you have any questions about this statement or about your rights under ERISA, or if you need assistance in obtaining documents from the Plan Administrator, you should contact the nearest office of the Employee Benefits Security Administration, U.S. Department of Labor (listed in your telephone directory) or contact the Division of Technical Assistance and Inquiries, Employee Benefits Security Administration, U.S. Department of Labor, 200 Constitution Avenue N.W., Washington, D.C. 20210. You may also obtain certain publications about your rights and responsibilities under ERISA by calling the publications hotline of the Employee Benefits Security Administration.

Genetic Information & Confidentiality

Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA), which prohibits genetic information discrimination in employment, took effect on November 21, 2009.

Definition of "Genetic Information"

Genetic information includes information about an individual's genetic tests and the genetic tests of an individual's family members, as well as information about the manifestation of a disease or disorder in an individual or an individual's family members (i.e., family medical history). Family medical history is included in the definition of genetic information because it is often used to determine whether someone has an increased risk of getting a disease, disorder, or developing a condition in the future. Genetic information also includes an individual's request for, or receipt of, genetic services, or the participation in clinical research that includes genetic services by the individual or a family member of the individual, and the genetic information of a fetus carried by an individual or by a pregnant woman who is a family member of the individual and the genetic information of any embryo legally held by the individual or family member using an assisted reproductive technology.

Discrimination Because of Genetic Information

The law forbids discrimination on the basis of genetic information when it comes to

Confidentiality of Genetic Information

It is also unlawful for a covered entity to disclose genetic information about applicants, employees, or members. Covered entities must keep genetic information confidential and in a separate medical file. (Genetic information may be kept in the same file as other medical information in compliance with the Americans with Disabilities Act.) There are limited exceptions to this non-disclosure rule, such as exceptions that provide for the disclosure of relevant genetic information to government officials investigating compliance with Title II of GINA and for disclosures made pursuant to a court order.