From: Cecchi, Kimberly <kimberly_cecchi@vanguard.com>
Sent: Monday, November 19, 2018 8:50 AM
Subject: Update to Vanguards Fund Information Table Effective 11/19/2018

Dear Trading Partner:

Thank you for investing in Vanguard® funds. Vanguard announced today that it is broadening access to lower-cost Admiral™ Shares of its index funds for additional individual, advisor, and institutional clients. Attached is an updated version of our Fund Information Table which provides a complete list of eligible Vanguard Funds, including their dividend schedules and fee information. Please replace your existing Fund Information Table with the updated version and forward it to your respective trading areas. All fund updates on the Fund Information Table are shaded in gray.

Effective November 19, 2018

The Admiral Share class minimum for 38 index products will be reduced from \$10,000 to \$3,000 for retail investors and will now also be available to those accessing these products through mutual fund supermarkets.

The Investor Share class of these funds will be closed to new investors.

Thank you in advance for adhering to these new requirements. If you have any questions or would like to update your contact information, please contact us at contracts@vanguard.com or 1-800-669-0498. You may also contact your Relationship Management Team via email at fasrmsupport@vanguard.com or via phone at 1-800-232-6171.

Sincerely,

Vanguard Financial Advisor Services™

The CUSIP Data contained in this document (Attachment A) consists of security identifiers and related descriptive information ("the CUSIP Database") and is protected under the U.S. copyright laws and is licensed with permission from CUSIP Global Services ("CGS"), on behalf of the American Bankers Association (ABA). © 2018

Recipient agrees and acknowledges that the CUSIP Database and the information contained therein is and shall remain valuable intellectual property owned by, or licensed to, CUSIP Global Services and the American Bankers Association ("ABA"), and that no proprietary rights are being transferred to visitor in such materials or in any of the information contained therein. Any use of the CUSIP Data by Recipient outside of the clearing and settlement of transactions requires a license from CGS, along with an associated fee based on usage. Recipient agrees that misappropriation or misuse of such materials will cause serious damage to CGS and ABA, and that in such event money damages may not constitute sufficient compensation to CGS and ABA; consequently, Recipient agrees that in the event of any misappropriation or misuse, CGS and ABA shall have the right to obtain injunctive relief in addition to any other legal or financial remedies to which CGS and ABA may be entitled.

Recipient agrees that it shall not publish nor distribute in any medium the CUSIP Database or any substantial portion of the information contained therein or summaries or subsets thereof to any person or entity. Recipient may not create or maintain a master file or database of CUSIP identifiers or descriptions for itself or any third party recipient that is intended to serve as a substitute for any CUSIP service.

NEITHER CGS, ABA NOR ANY OF THEIR AFFILIATES MAKE ANY WARRANTIES, EXPRESS OR IMPLIED, AS TO THE ACCURACY, ADEQUACY OR COMPLETENESS OF ANY OF THE INFORMATION CONTAINED IN THE CUSIP DATABASE. ALL SUCH MATERIALS ARE PROVIDED TO RECIPIENT ON AN "AS IS" BASIS, WITHOUT ANY WARRANTIES AS TO MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE NOR WITH RESPECT TO THE RESULTS WHICH MAY BE OBTAINED FROM THE USE OF SUCH MATERIALS. NEITHER CGS, ABA NOR THEIR AFFILIATES SHALL HAVE ANY RESPONSIBILITY OR LIABILITY FOR ANY ERRORS OR OMISSIONS NOR SHALL THEY BE LIABLE FOR ANY DAMAGES, WHETHER DIRECT OR INDIRECT, SPECIAL OR CONSEQUENTIAL, EVEN IF THEY HAVE BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES. IN NO EVENT SHALL THE LIABILITY OF, CGS, ABA OR ANY OF THEIR AFFILIATES PURSUANT TO ANY CAUSE OF ACTION, WHETHER IN CONTRACT, TORT, OR OTHERWISE, EXCEED THE FEE PAID BY RECIPIENT FOR ACCESS TO SUCH MATERIALS IN THE MONTH IN WHICH SUCH CAUSE OF ACTION IS ALLEGED TO HAVE ARISEN. FURTHERMORE, CGS AND ABA SHALL HAVE NO RESPONSIBILITY OR LIABILITY FOR DELAYS OR FAILURES DUE TO CIRCUMSTANCES BEYOND THEIR CONTROL.

Kim Cecchi

Client Relationship Administrator
Vanguard Financial Advisor Services™
400 Devon Park Drive | Mailport 221 | Wayne, PA 19087
Direct: 610-503-0548 | Ext. 30548 | kimberly_cecchi@wanguard.com