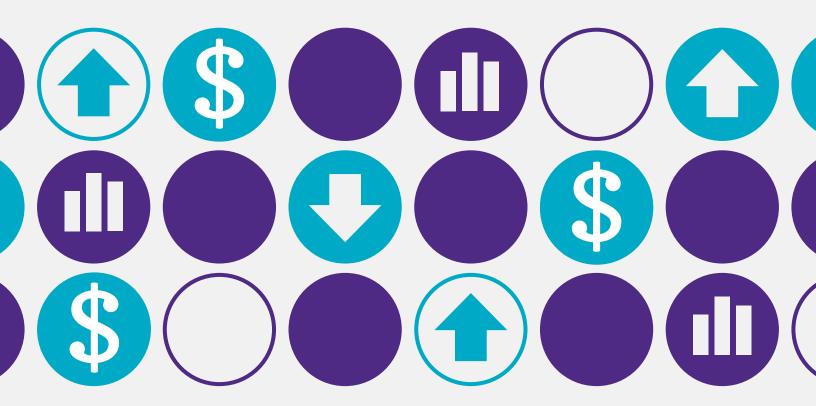
HealthEquity ADVISORS, LLC

"Investor Choice" fund lineup quarterly report card Q1 2021





Important information

Investments available to HSA holders are subject to risk, including the possible loss of the principal invested and are not FDIC or NCUA insured, or guaranteed by HealthEquity, Inc. HSA holders may select Vanguard funds for investment through the HealthEquity investment platform but HealthEquity, Inc. does not provide investment advice. HealthEquity Advisors, LLC, a wholly owned subsidiary of HealthEquity, Inc. and an SEC-registered investment adviser, provides web-based investment advice to HSA holders that subscribe for its services (minimum thresholds and additional fees apply). Registration does not imply endorsement by any state or agency and does not imply a level of skill, education, or training. Investing may not be suitable for everyone. You should carefully consider the investment objectives, risks, charges and expenses of any mutual fund before investing. A prospectus and, if available, a summary prospectus containing this and other important information can be obtained by visiting the Vanguard website at vanguard.com. Please read the prospectus carefully before investing.

Nothing in this communication is intended as legal, tax or financial advice. Always consult a professional when making life changing decisions.

INTRODUCTION WATCH LIST IMPORTANT INFORMATION INVESTOR CHOICE FUND PERFORMANCE FIVE YEAR WEIGHTED PEER PERFORMANCE GRADES INVESTOR CHOICE REPORT CARD **FUND OPERATIONAL EXPENSE RATIO FUND PERFORMANCE ANNUALIZED FUND MANAGER'S REPORT INVESTMENT COMMITTEE** FIDUCIARY STANDARD OF OVERSIGHT **QUARTERLY REPORT TO PARTNERS**

SUMMARY

Introduction

HealthEquity Advisors, LLC publishes this quarterly report card for our partners, to provide visibility and transparency into our processes and procedures regarding mutual fund selection, monitoring, and ongoing oversight. Our methodologies for selection, retention, and rotation are based on the fiduciary standard of oversight, which dictates that our responsibilities focus on the best interests of our clients.

Investment Committee

The HealthEquity Advisors, LLC Investment Committee last met on February 17, 2021 to review all fund selection, retention, and rotation criterion. The next Investment Committee meeting is scheduled for May 19, 2021. The Investment Committee is comprised of the following individuals:

HealthEquity Advisors, LLC Officers

- Cordell Eggett, Director of Finance
- · James Ivie, Managing Director

Outside consultant advisor and mutual fund industry expert

• Dr. Craig Israelsen, PhD

Fiduciary Responsibility

As a registered investment adviser under the Investment Advisers Act of 1940, HealthEquity Advisors, LLC has a fiduciary responsibility to its clients pertaining to the analysis and oversight of mutual fund investments it selects and is made available to Health Savings Account ("HSA") beneficiaries ("Members"). As such, HealthEquity Advisors, LLC will replace a fund if it does not meet the defined retention criterion over a period of time specified in our methodologies for fund selection, retention, and rotation. There is no set schedule for fund replacements. HealthEquity Advisors, LLC actively monitors the investment offerings with a view to providing Members with the highest quality funds as defined by our oversight criterion at the end of this report. The purpose of our selection and oversight process is to protect Members' investments from being left unsupervised in poorly performing funds for long periods of time.

Q1 watch list

Every quarter HealthEquity Advisors, LLC publishes a watch list. Funds that are on the watch list have breached criterion outlined in the analytical methodologies described below.

There are currently no funds from the Investor Choice fund lineups on the watch list for the first quarter of 2021.

Note: Any Members with investment positions in funds marked for removal will be notified through electronic communication about when the funds will be closed to new investment, as well as information about migration of the funds to other funds within the same asset class category.

Important information

Past performance does not guarantee future performance. Investment value will fluctuate, and shares, when redeemed, may be worth more or less than original cost. All performance illustrated is net of mutual fund operating expenses.

The term "Investor Choice" is solely the naming convention of the fund menu and in no way suggests or implies a guarantee of return to investors from the funds being offered.

The Investor Choice lineup consists of low-cost share classes. HealthEquity, Inc. charges an administration fee directly to the member in addition to the mutual fund operating expense ratio. These funds appear with a graphic icon in the HealthEquity, Inc. investment desktop to provide transparency that a direct charge to the member will apply for investing in the funds on the HealthEquity HSA platform.

Investors should carefully consider information contained in each fund's prospectus, including investment objectives, risks, charges and expenses.

All funds offered in the Investor Choice lineup are no load mutual funds and often are Institutional share classes. There are no sales charges, trading fees, short term redemption fees or fund minimums to invest in the Investor Choice lineup of funds. The only fees charged for investing in the Investor Choice funds are 1) the mutual fund operating expense ratio charged by the mutual fund itself and is not controlled or influenced by HealthEquity Advisors, LLC or its affiliates, and 2) the Investment Administration Fee (0.36% annually, which is charged to the HSA cash balance as 0.03% per month times the average daily balance invested in the Investor Choice Funds), which is charged by HealthEquity up to a maximum of \$10 per month. To calculate the total expense of investing in the Investor Choice funds, you would add the fund operating expense ratio to the Investment Administration Fee. For example, the Vanguard Growth Index I (VIGIX) has a fund operating expense ratio of 0.04% annually. When combined with the Investment Administration Fee of 0.36% annually, this equals a total expense to the investor of 0.40% annually. This equates to \$4.00 per year per \$1,000 dollars invested in this example.

Neither HealthEquity nor any of its affiliates receives any compensation for recordkeeping costs from any of the Investor Choice funds.

With respect to the Investor Choice portfolios, HealthEquity, Inc. offers two payment options: employer pay or charge to the Member's HSA. Whether recordkeeping costs are paid by the mutual fund, the employer, or charged to the Member, they are materially the same as a percentage of invested assets under management and play no material role in fund selection.

In addition, Advisor, powered by HealthEquity Advisors, LLC, provides to subscribing Members web-based professional investment guidance and access to powerful online tools to help maximize tax-free HSA earnings potential. There are two service options of Advisor, GPS and AutoPilot. These options give Members the flexibility to receive web-based guidance which the Member can use to implement suggested advice via GPS, or receive full-service management of their portfolio via AutoPilot.

The additional charge for using either Advisor GPS or AutoPilot is 0.05% per month based on the average daily balance (e.g. \$0.50 cents per \$1,000 invested) up to a maximum of \$15 per month.

The advisory fees for those Members who elect to use Advisor may be paid either from the subscriber's HSA or by the employer. We are happy to provide employer pricing upon request.

A Member may simply want to self-direct their own investments through the HealthEquity, Inc. investment desktop without the help of the Advisor program GPS or AutoPilot. HealthEquity, Inc. calls that "Self-Driven." Members may choose from the Investor Choice lineup of funds, which are selected and reviewed quarterly by HealthEquity Advisors, LLC based on a set of transparent criteria.

The five year peer performance grades represent a proprietary algorithm of HealthEquity Advisors, LLC. The grades are a cumulative one, three, and five year peer weighted comparison of fund performance within an asset class/category. The objective of the five year peer grade is to filter for funds that may have a propensity for performing with consistency over a five year period. In combination with measures of volatility and risk (standard deviation), the five year weighted peer grade becomes an important method of assessment.

Grades are rendered in quintiles (1/5):

Top 20% = A Next 20% = B Middle 20% = C Next 20% = D Bottom 20% = F

Intergrade iterations are rendered with Plus (+) and Minus (-).

Nothing in this communication is intended as legal, tax or financial advice. Always consult a professional when making life changing decisions.

Mutual Fund data is sourced from Lipper (subsidiary of Thomson Reuters), Financial Content Inc., and Charles Schwab Corporation. HealthEquity Advisors, LLC and its parent company cannot warranty the accuracy of the illustrated data. Data providers may be added or removed at any time at the discretion of HealthEquity Advisors, LLC without prior notice.

Investor Choice fund lineup

Overall performance & expense*

The table shows fund name, ticker symbol, five year weighted peer performance grade, mutual fund operational expense ratio, third quarter total return, one year return, three year return annualized, and five year return annualized.

		Mgmt	5 yr peer	Fund expense	Q1 total	one	three	five
Fund name	Symbol	style	grade	ratio	return	year	years	year
Aggregate Bonds				,				
Vanguard Short Term Bond Idx Adm	VBIRX	Passive	B+	0.07	-0.60	1.79	3.59	2.25
Vanguard Total Bond Market Idx InstPls	VBMPX	Passive	В	0.03	-3.61	0.56	4.65	3.09
Foreign Bonds								
Vanguard Total Intl Bond Idx Adm	VTABX	Passive	B-	0.11	-2.31	1.98	3.96	3.27
Inflation Protected Bonds								
Vanguard Inflation-Protected Secs I	VIPIX	Passive	B+	0.07	-1.41	7.49	5.63	3.77
Vanguard Short Term Infl-Prot Sec Idx Adm	VTAPX	Passive	В	0.06	1.08	6.88	3.73	2.61
Large Cap Stocks								
Vanguard Growth Index I	VIGIX	Passive	A	0.04	1.49	64.94	23.11	20.61
Vanguard Institutional Index Instl P1	VIIIX	Passive	A-	0.02	6.18	56.37	16.78	16.29
Vanguard Value Idx Adm	VVIAX	Passive	В	0.05	10.99	51.33	11.41	12.72
Mid-Cap Stocks				,		,		,
Vanguard Extended Market Idx InstIPlus	VEMPX	Passive	A-	0.04	7.80	97.96	18.22	18.03
Vanguard Mid-Cap Value Idx Adm	VMVAX	Passive	В	0.07	13.70	69.87	9.83	11.64
Small Cap Stocks								
Vanguard Small Cap Index Adm	VSMAX	Passive	В	0.05	10.22	87.72	14.97	15.60
Vanguard Small-Cap Value Idx Adm	VSIAX	Passive	В	0.07	16.81	89.83	10.80	12.42
International Stocks								'
Vanguard Total Intl Stock Idx InstlPIs	VTPSX	Passive	В	0.07	3.96	52.84	6.55	10.01
Emerging Markets Stocks								
Vanguard Emerging Mkts Stock Idx I	VEMIX	Passive	B-	0.10	3.57	58.25	6.36	11.35

^{*}Illustrated fund performance is net of mutual fund operational expense ratios. The three year and five year performance periods are annualized (total return for the period divided by number of years). | Past performance does not guarantee future performance. | Mutual Fund data is sourced from Lipper (A subsidiary of Thomson Reuters), Financial Content Inc., and Charles Schwab Corporation. HealthEquity Advisors, LLC and its affiliates cannot warranty the accuracy of the illustrated data. | Data providers may be added or removed at any time at the discretion of HealthEquity Advisors, LLC without prior notice. Investments are subject to risk, including the possible loss of the principal invested and are not FDIC or NCUA insured, or guaranteed by HealthEquity, Inc. HSA holders may select Vanguard funds for investment through the HealthEquity, Inc. does not provide investment objectives, risks, charges and expenses of any mutual fund before investing. A prospectus and, if available, a summary prospectus containing this and other important information can be obtained by visiting the Vanguard website at vanguard.com. Please read the prospectus carefully before investing.

Fund name	Symbol	Mgmt style	5 yr peer grade	Fund expense ratio	Q1 total return	one vear	three vears	five year
Real Estate	Official	ocyto	Siddo	racio	roturn	your	youro	your
Vanguard REIT Index I	VGSNX	Passive	В	0.10	8.69	36.52	11.01	6.15
Natural Resources								
Vanguard Materials Index Adm	VMIAX	Passive	A	0.10	10.36	82.96	12.46	14.01
Other (Balanced Allocation)								
Vanguard Wellesley® Income Admiral™	VWIAX	Active	В	0.16	1.04	18.45	8.48	7.43
Target Date Funds								
Vanguard Target Retirement 2020 Inv	VTWNX	Glidepath	NA	0.13	1.28	27.16	8.73	8.92
Vanguard Target Retirement 2030 Inv	VTHRX	Glidepath	NA	0.14	2.49	37.19	10.26	10.77
Vanguard Target Retirement 2040 Inv	VFORX	Glidepath	NA	0.14	3.82	46.64	11.43	12.36
Vanguard Target Retirement 2050 Inv	VFIFX	Glidepath	NA	0.15	4.53	51.82	12.09	12.93
Vanguard Target Retirement 2060 Inv	VTTSX	Glidepath	NA	0.15	4.54	51.75	12.06	12.91
Vanguard Retirement Income Inv	VTINX	Retirement	NA	0.12	0.08	17.02	7.06	6.38

^{*}Illustrated fund performance is net of mutual fund operational expense ratios. The three year and five year performance periods are annualized (total return for the period divided by number of years). | Past performance does not guarantee future performance. | Mutual Fund data is sourced from Lipper (A subsidiary of Thomson Reuters), Financial Content Inc., and Charles Schwab Corporation. HealthEquity Advisors, LLC and its affiliates cannot warranty the accuracy of the illustrated data. | Data providers may be added or removed at any time at the discretion of HealthEquity Advisors, LLC without prior notice. Investments are subject to risk, including the possible loss of the principal invested and are not FDIC or NCUA insured, or guaranteed by HealthEquity, Inc. HSA holders may select Vanguard funds for investment through the HealthEquity investment platform but HealthEquity, Inc. does not provide investment objectives, risks, charges and expenses of any mutual fund before investing. A prospectus and, if available, a summary prospectus containing this and other important information can be obtained by visiting the Vanguard website at vanguard.com. Please read the prospectus carefully before investing.

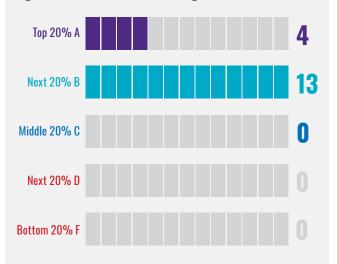
Five year peer performance grades

The determination of the peer performance grade is a proprietary algorithm of HealthEquity Advisors, LLC in which funds are measured against their peer asset class grouping for consistency in performance as measured over a one to five year period. In conjunction with this measure, we filter for not just funds that are top performers, but funds that have achieved this five year level of consistency with the same management team in place. Managerial attribution is an important measure of a fund's ability to continue patterns of decision making going forward. While we understand that historical results are no guarantee of future performance, we nevertheless believe that it remains a relevant, salient measure of a fund's future opportunity, though it is simply one of many data points that should be taken into consideration.

We use the colors RED & GREEN to delineate changes that are positive from those that are negative in columns illustrating variance from prior quarter, or overall performance.

HealthEquity Advisors, LLC Investor Choice report card

Five year weighted peer performance rank (persistence)



Average peer performance: B

Quick stats

- Number of funds: 23
- Management style: 16 Passive, 1 Active,
 6 Target Date
- Fund families represented: 1
- Proprietary funds: none
- Manager tenure average: 12.29 years
- Asset classes: 10 plus 6 Target Date funds
- Annual fund expense average:

All funds 0.0887%,

Active funds only 0.16%,

Passive funds only 0.07%

- Target date funds: 0.14%
- Annual investment administration fee1: 0.36%

Capped at \$10

- Trading fees: none
- Fund minimums: none
- Short-term redemption fees: none

¹HealthEquity Inc. charges an annual Investment Administration Fee of 0.36% annual. It is charged on a monthly basis (0.03% per month) against the average daily balance invested in the Investor Choice Funds. There is a \$10 maximum applied to this monthly fee. Investors should add the mutual fund annual expense ratio to the Investment Administration Fee to determine the total annual cost for investing in the Investor Choice Funds, plus any advisory fees to which they subscribe.

Fund name	Symbol	Grade Q4	Grade Q1	Grade change
Aggregate Bonds				
Vanguard Short Term Bond Idx Adm	VBIRX	B+	B+	0
Vanguard Total Bond Market Idx InstIPIs	VBMPX	B+	В	-1
Foreign Bonds	'	'		'
Vanguard Total Intl Bond Idx Adm	VTABX	A -	B-	-3
Inflation Protected Bonds	1	'		'
Vanguard Inflation-Protected Secs I	VIPIX	A	B+	-2
Vanguard Short Term Infl-Prot Sec Idx Adm	VTAPX	В	В	0
Large Cap Stocks	1	'		
Vanguard Growth Index I	VIGIX	A	A	0
Vanguard Institutional Index Instl PI	VIIIX	A -	A-	0
Vanguard Value Idx Adm	VVIAX	В	В	0
Mid-Cap Stocks	-	'		
Vanguard Extended Market Idx InstIPlus	VEMPX	A -	A-	0
Vanguard Mid-Cap Value ldx Adm	VMVAX	B÷	В	-1
Small Cap Stocks	1	'		'
Vanguard Small Cap Index Adm	VSMAX	B+	В	-1
Vanguard Small-Cap Value Idx Adm	VSIAX	В	В	0
International Stocks		'		
Vanguard Total Intl Stock Idx InstlPls	VTPSX	В	В	0
Emerging Markets Stocks	1	'		'
Vanguard Emerging Mkts Stock Idx I	VEMIX	B-	B-	0
Real Estate	1	'		
Vanguard REIT Index I	VGSNX	C+	В	2
Natural Resources		'		
Vanguard Materials Index Adm	VMIAX	A	A	0
Other (Balanced Allocation)		'		
Vanguard Wellesley® Income Admiral™	VWIAX	A -	В	-2
Target Date Funds	'	'		
Vanguard Target Retirement 2020 Inv	VTWNX	NA	NA	NA
Vanguard Target Retirement 2030 Inv	VTHRX	NA	NA	NA
Vanguard Target Retirement 2040 Inv	VFORX	NA	NA	NA
Vanguard Target Retirement 2050 Inv	VFIFX	NA	NA	NA
Vanguard Target Retirement 2060 Inv	VTTSX	NA	NA	NA
Vanguard Retirement Income Inv	VTINX	NA	NA	NA

Fund operational expense ratio (OER)

This is the percentage of fund assets charged by a fund for operating expenses and management fees. The expense ratio typically includes the following types of fees: accounting, administrator, advisor, auditor, board of directors, custodial, distribution (12b-1), legal, organizational, professional, registration, shareholder reporting, sub-advisor, and transfer agency. The expense ratio does not reflect the fund's brokerage costs or any investor sales charges. In contrast to the gross expense ratio, the net expense ratio does reflect fee waivers in effect during the time period.

Also known as the total annual fund operating expense ratio net of reimbursements, Morningstar pulls the prospectus net expense ratio from the fund's most recent prospectus. Prospectus expense ratios reflect material changes to the expense structure for the current period, while annual report expense ratios reflect the actual fees charged during a particular fiscal year.

The Investor Choice lineup of funds are mostly comprised of Investor, Admiral, Institutional, and Institutional Plus share class funds. HealthEquity Inc. or its subsidiaries receives no form of compensation from funds in the the Investor Choice mutual fund lineup. HealthEquity Inc. applies an investment administrative fee of 0.36% annually to cover the expenses of administration, recordkeeping, compliance and oversight for this platform of funds. HealthEquity applies a \$10 maximum to the monthly Investment Administration Fee. Investors should combine the annual mutual fund expense ratio PLUS the HealthEquity, Inc. investment administration fee to determine the total annual expense for investing in a fund.

For example:

Fund name	Symbol	Fund expense	Admin fee	Total annual expense
Vanguard Growth Index I	VIGIX	0.04%	0.36%	0.40%

Any fees associated with advisory services should also be considered when determining total annual expense and may vary based on service level.

Note: This is for illustrative purposes only. Fund expenses, which HealthEquity Advisors, LLC does not control or influence, may fluctuate from month to month per the mutual fund company. Investors should read carefully the prospectus of any mutual fund intended for investment. The investment administration fee charged by HealthEquity, Inc. of 0.36% annually is charged monthly against the average invested balance in the Investor Choice funds, which breaks down to a monthly fee of 0.03% on invested balance in the Investor Choice funds. This Investment Administration Fee is capped at \$10 per month.

We use the colors RED & GREEN to delineate changes that are positive from those that are negative in columns illustrating variance from prior quarter, or overall performance.

Fund expense ratio Q1 headline

Out of 23 funds, the following variances occurred in Q1 2021:

None

Fund name	Symbol	OER Q4	OER Q1	Change	HealthEquity investment admin fee	Total annual expense
Aggregate Bonds						
Vanguard Short Term Bond Idx Adm	VBIRX	0.07	0.07	0	0.36	0.43
Vanguard Total Bond Market Idx InstIPIs	VBMPX	0.03	0.03	0	0.36	0.39
Foreign Bonds						
Vanguard Total Intl Bond Idx Adm	VTABX	0.11	0.11	0	0.36	0.47
Inflation Protected Bonds						
Vanguard Inflation-Protected Secs I	VIPIX	0.07	0.07	0	0.36	0.43
Vanguard Short Term Infl-Prot Sec Idx Adm	VTAPX	0.06	0.06	0	0.36	0.42

					HealthEquity investment	Total annual
Fund name	Symbol	OER Q4	OER Q1	Change	admin fee	expense
Large Cap Stocks				ı		
Vanguard Growth Index I	VIGIX	0.04	0.04	0	0.36	0.40
Vanguard Institutional Index Instl PI	VIIIX	0.02	0.02	0	0.36	0.38
Vanguard Value Idx Adm	VVIAX	0.05	0.05	0	0.36	0.41
Mid-Cap Stocks						
Vanguard Extended Market Idx InstlPlus	VEMPX	0.04	0.04	0	0.36	0.40
Vanguard Mid-Cap Value Idx Adm	VMVAX	0.07	0.07	0	0.36	0.43
Small Cap Stocks						
Vanguard Small Cap Index Adm	VSMAX	0.05	0.05	0	0.36	0.41
Vanguard Small-Cap Value Idx Adm	VSIAX	0.07	0.07	0	0.36	0.43
International Stocks	'	'	1			'
Vanguard Total Intl Stock Idx InstIPIs	VTPSX	0.07	0.07	0	0.36	0.43
Emerging Markets Stocks						
Vanguard Emerging Mkts Stock Idx I	VEMIX	0.10	0.10	0	0.36	0.46
Real Estate						
Vanguard REIT Index I	VGSNX	0.10	0.10	0	0.36	0.46
Natural Resources		,				
Vanguard Materials Index Adm	VMIAX	0.10	0.10	0	0.36	0.46
Other (Balanced)						
Vanguard Wellesley® Income Admiral™	VWIAX	0.16	0.16	0	0.36	0.52
Target Date Funds						
Vanguard Target Retirement 2020 Inv	VTWNX	0.13	0.13	0	0.36	0.49
Vanguard Target Retirement 2030 Inv	VTHRX	0.14	0.14	0	0.36	0.50
Vanguard Target Retirement 2040 Inv	VFORX	0.14	0.14	0	0.36	0.50
Vanguard Target Retirement 2050 Inv	VFIFX	0.15	0.15	0	0.36	0.51
Vanguard Target Retirement 2060 Inv	VTTSX	0.15	0.15	0	0.36	0.51
Vanguard Retirement Income Inv	VTINX	0.12	0.12	0	0.36	0.48

Fund performance annualized

Q1, One year, three year annualized, five year annualized*

Fund performance for the Investor Choice fund platform is illustrated below. The three year and five year performance is annualized. The performance for the first quarter of 2021 is also illustrated. All fund performance for any time period of measurement is net of fund expenses. Negative returns are in red and positive returns are in green.

Fund performance comparison·

Fund name	Symbol	Mamt atula	Q1 total	ana yaar	thron your	five year
Fund name	Syllingi	Mgmt style	return	one year	three year	five year
Aggregate Bonds						I
Vanguard Short Term Bond Idx Adm	VBIRX	Passive	-0.60	1.79	3.59	2.25
Vanguard Total Bond Market Idx InstIPIs	VBMPX	Passive	-3.61	0.56	4.65	3.09
Foreign Bonds						
Vanguard Total Intl Bond Idx Adm	VTABX	Passive	-2.31	1.98	3.96	3.27
Inflation Protected Bonds						
Vanguard Inflation-Protected Secs I	VIPIX	Passive	-1.41	7.49	5.63	3.77
Vanguard Short Term Infl-Prot Sec Idx Adm	VTAPX	Passive	1.08	6.88	3.73	2.61
Large Cap Stocks						
Vanguard Growth Index I	VIGIX	Passive	1.49	64.94	23.11	20.61
Vanguard Institutional Index Instl PI	VIIIX	Passive	6.18	56.37	16.78	16.29
Vanguard Value Idx Adm	VVIAX	Passive	10.99	51.33	11.41	12.72
Mid-Cap Stocks						
Vanguard Extended Market Idx InstlPlus	VEMPX	Passive	7.80	97.96	18.22	18.03
Vanguard Mid-Cap Value Idx Adm	VMVAX	Passive	13.70	69.87	9.83	11.64

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Fund performance comparison·····

			01 4-4-1			
Fund name	Symbol	Mgmt style	Q1 total return	one year	three year	five year
Small Cap Stocks						
Vanguard Small Cap Index Adm	VSMAX	Passive	10.22	87.72	14.97	15.60
Vanguard Small-Cap Value Idx Adm	VSIAX	Passive	16.81	89.83	10.80	12.42
International Stocks						
Vanguard Total Intl Stock Idx InstIPIs	VTPSX	Passive	3.96	52.84	6.55	10.01
Emerging Markets Stocks						
Vanguard Emerging Mkts Stock Idx I	VEMIX	Passive	3.57	58.25	6.36	11.35
Real Estate						
Vanguard REIT Index I	VGSNX	Passive	8.69	36.52	11.01	6.15
Natural Resources						
Vanguard Materials Index Adm	VMIAX	Passive	10.36	82.96	12.46	14.01
Others (Balanced)						
Vanguard Wellesley® Income Admiral™	VWIAX	Active	1.04	18.45	8.48	7.43
Target Date Funds						
Vanguard Target Retirement 2020 Inv	VTWNX	Passive	1.28	27.16	8.73	8.92
Vanguard Target Retirement 2030 Inv	VTHRX	Passive	2.49	37.19	10.26	10.77
Vanguard Target Retirement 2040 Inv	VFORX	Passive	3.82	46.64	11.43	12.36
Vanguard Target Retirement 2050 Inv	VFIFX	Passive	4.53	51.82	12.09	12.93
Vanguard Target Retirement 2060 Inv	VTTSX	Passive	4.54	51.75	12.06	12.91
Vanguard Retirement Income Inv	VTINX	Passive	0.08	17.02	7.06	6.38

^{*}Illustrated fund performance is net of mutual fund operational expense ratios. The three year and five year performance periods are annualized (total return for the period divided by number of years). | Past performance does not guarantee future performance. | Mutual Fund data is sourced from Lipper (A subsidiary of Thomson Reuters), Financial Content Inc., and Charles Schwab Corporation. HealthEquity Advisors, LLC and its affiliates cannot warranty the accuracy of the illustrated data. | Data providers may be added or removed at any time at the discretion of HealthEquity Advisors, LLC without prior notice. Investments are subject to risk, including the possible loss of the principal invested and are not FDIC or NCUA insured, or guaranteed by HealthEquity, Inc. HSA holders may select Vanguard funds for investment through the HealthEquity investment platform but HealthEquity, Inc. does not provide investment advice. You should carefully consider the investment objectives, risks, charges and expenses of any mutual fund before investing. A prospectus and, if available, a summary prospectus containing this and other important information can be obtained by visiting the Vanguard website at vanguard.com. Please read the prospectus carefully before investing.

Q1 fund manager's report

The Investor Choice fund lineup is made up of all passive low-cost index funds. Management tenure, peer performance ranking, standard deviation and portfolio turnover ratio are all data points monitored by HealthEquity Advisors, LLC.

In the case of passively managed funds, the fund manager certainly helps in maintaining the integrity of the respective index being tracked, however index fund management does not carry with it the same properties of measurement that are inherent in actively managed funds.

We use the colors RED & GREEN to delineate changes that are positive from those that are negative in columns illustrating variance from prior quarter, or overall performance.

Summary

There are no fund manager changes to report this quarter.

Fund name	Symbol	Manager(s) name	Q4 tenure	Q1 tenure	Change
Aggregate bonds					
Vanguard Short Term Bond Idx Adm	VBIRX	Wrazen Barrickman	7.92	8.17	0.25
Vanguard Total Bond Market Idx InstIPIs	VBMPX	Joshua Barrickman	7.92	8.17	0.25
Foreign Bonds					
Vanguard Total Intl Bond Idx Adm	VTABX	Wrazen Barrickman	7.67	7.92	0.25
Inflation Protected Bonds					
Vanguard Inflation-Protected Secs I	VIPIX	Gemma Wright-Casparius	9.42	9.67	0.25
Vanguard Short Term Infl-Prot Sec Idx Adm	VTAPX	Joshua Barrickman	8.25	8.50	0.25
Large Cap Stocks					
Vanguard Growth Index I	VIGIX	Nejman, O'Reilly	26.08	26.33	0.25
Vanguard Institutional Index Instl PI	VIIIX	Geiger, Butler	20.08	20.33	0.25
Vanguard Value Idx Adm	VVIAX	Nejman, O'Reilly	26.08	26.33	0.25
Mid-Cap Stocks		'		,	
Vanguard Extended Market Idx InstiPlus	VEMPX	Coleman, Butler	23.08	23.33	0.25
Vanguard Mid-Cap Value Idx Adm	VMVAX	Johnson, Butler	14.42	14.67	0.25
Small Cap Stocks		'			
Vanguard Small Cap Index Adm	VSMAX	Coleman, O'Reilly	4.75	5.00	0.25
Vanguard Small-Cap Value Idx Adm	VSIAX	Coleman, O'Reilly	4.75	5.00	0.25
International Stocks		'		'	,
Vanguard Total Intl Stock Idx InstIPIs	VTPSX	Perre, Franquin	12.42	12.67	0.25
Emerging Markets Stocks					
Vanguard Emerging Mkts Stock Idx I	VEMIX	Miller, Perre	12.42	12.67	0.25

Fund name	Symbol	Manager(s) name	Q4 tenure	Q1 tenure	Change
Real Estate					
Vanguard REIT Index I	VGSNX	Nejman, O'Reilly	24.67	24.92	0.25
Natural Resources					
Vanguard Materials Index Adm	VMIAX	Coleman, Louie	5.42	5.67	0.25
Other (Balanced Allocation)					
Vanguard Wellesley® Income Admiral™	VWIAX	Keogh, Reckmeyer, Stack, Moran	14.00	14.25	0.25
Target Date Funds					
Vanguard Target Retirement 2020 Inv	VTWNX	Coleman, Nejman	7.92	8.17	0.25
Vanguard Target Retirement 2030 Inv	VTHRX	Coleman, Nejman	7.92	8.17	0.25
Vanguard Target Retirement 2040 Inv	VFORX	Coleman, Nejman	7.92	8.17	0.25
Vanguard Target Retirement 2050 Inv	VFIFX	Coleman, Nejman	7.92	8.17	0.25
Vanguard Target Retirement 2060 Inv	VTTSX	Coleman, Nejman	7.92	8.17	0.25
Vanguard Retirement Income Inv	VTINX	Coleman, Nejman	7.92	8.17	0.25

Investment Committee

The HealthEquity Advisors, LLC Investment Committee last met on February 17, 2021 to review all fund selection, retention, and rotation criterion. The next Investment Committee meeting is scheduled for May 19, 2021. The Investment Committee is comprised of the following individuals:

HealthEquity Advisors, LLC Officers

- · Cordell Eggett, Director of Finance
- · James Ivie, Managing Director

Outside consultant administrator and mutual fund industry expert

· Dr. Craig Israelsen, PhD

Fiduciary Responsibility

As a registered investment adviser under the Investment Advisers Act of 1940, HealthEquity Advisors, LLC has a fiduciary responsibility to its clients pertaining to the analysis and oversight of mutual fund investments it selects and is made available to Members. As such HealthEquity Advisors, LLC will replace a fund if it does not meet our retention criterion over a period of time. There is no set schedule for fund replacements. HealthEquity Advisors, LLC actively monitors the investment offerings with a view to providing Members with the highest quality funds. The purpose of this selection and oversight process is to protect Member's investments from being left unsupervised in poorly performing funds for long periods of time.

The fund selection methodology for passive low-cost index funds is as follows:

1. Introduction

The purpose of this Investment Policy statement ("IPS") is to (1) establish guidelines for the investment portfolio utilized by subscribers to the Advisor program and (2) outline the accountability standards that will be used for monitoring the progress of the funds made available within the investment program.

2. Role of the investment committee

- A. The Investment Committee of HealthEquity Advisors, LLC is responsible for the review, analysis, and selection of all securities that are made available as investment options (collectively, the "Investment Options") to HealthEquity's HSA holders ("Members") through HQY's web-based HSA administration platform (the "Investment Desktop") and/or through Advisor's web-based, "robo"-investment advisory programs (collectively, the "Advisor Tool"). The Investment Committee is also responsible for reviewing and overseeing the implementation of the Advisor Tool to ensure that the Advisor Tool recommends portfolios of Investment Options that are in the best interests of Advisor's clients.
- B. The investment policies on behalf of Advisor's clients contained herein have been formulated consistent with Advisor's clients' anticipated financial needs and in consideration of Advisor's clients' tolerance for assuming investment and financial risk.
- C. Policies contained in this statement are intended to provide guidelines, where necessary, for ensuring that the investments on behalf of Advisor's clients are managed consistent with the shortterm and long-term financial goals of Advisor clients.
- D. The Investment Committee will review this Investment Policy Statement at least once per year. Changes to this IPS can be made only by affirmation of a majority of the Investment Committee, and written confirmation of the changes will be provided to all Investment Committee members and to any other parties hired on behalf of Advisor as soon thereafter as is practical.

3. Investment objective

A. The investments on behalf of Advisor's clients are made with the objective of preserving the long-term, real purchasing power of assets.

4. Portfolio investment policies

- A. The Investment Committee recognizes that the strategic allocation of the investment assets on behalf of Advisor's clients across defined sub-asset categories will be the most significant determinant of long-term investment returns.
- B. The Investment Committee expects that actual returns and return volatility will vary from expectations and return objectives across short periods of time.
- C. Outlined below are the sub-asset classes that will be made available as investment options to Members:
 - · Large cap US equity (Blend, Growth, and Value)
 - Midcap US equity (Blend and Value)
 - · Small cap US equity (Blend and Value)
 - · Non-US developed equity
 - · Non-US emerging equity
 - · Real estate
 - · Natural Resources
 - US Bonds (Intermediate duration and Short-duration)
 - · US inflation-protected bonds (TIPS)
 - · Non-US Bonds
- D. Investment asset class selection process

The selection criteria are outlined below:

- · Index-based funds where possible
- · Elimination of all fund revenue sharing
- · Availability of broad and diverse asset categories
- Minimal "style drift" within stated investment objective(s)
- Avoidance of investment redundancy within most common asset categories
- · Past and present peer performance
- · Reasonable fund management tenure
- · Fund expense ratio
- "Growth" and/or "value" fund options where applicable.

5. Monitoring investments and performance

The Investment Committee will periodically monitor the list of funds that meet the criterion for inclusion and make adjustments as deemed necessary.

- 6. Representation of the following ten asset classes per the HealthEquity Advisors, LLC Investment Policy Statement (IPS):
 - · Aggregate US Bonds
 - · Inflation Protected Bonds
 - · Foreign Bonds
 - · Large Cap Equities
 - · Mid Cap Equities
 - · Small Cap Equities
 - · International Equities
 - · Diversified Emerging Markets
 - · Real Estate
 - · Natural Resources
- Accurate and appropriate indexing representation of the underlying portfolio of the respective mutual fund per the chosen asset class.

Quarterly report to partners

The HealthEquity Advisors, LLC Investment Committee is comprised of HealthEquity Advisors, LLC Managing Director, the Director of Finance, and an outside mutual fund industry subject matter expert. The Chief Compliance Officer, is an observer of all Investment Committee meetings and provides guidance as to the investment management regulatory landscape when needed. The Investment Committee meets quarterly to evaluate all selection criterion, quarterly changes in fund manager(s), fund operational expense ratio (OER), five year weighted peer performance grades, standard deviation versus asset class average, portfolio turnover ratio versus fund twelve month/quarterly average, asset class rotation considerations based on overall economic conditions.

In an effort to maintain transparency on the fund offerings, HealthEquity Advisors, LLC will provide partners a quarterly report card. This report card will summarize the following:

Investor Choice:

- 1. Low-cost mutual fund annual operating expense ratio, defined as < 0.25% (25bps)
- 2. Representation of the following ten asset classes per the HealthEquity Advisors, LLC Investment Policy Statement (IPS):
 - · Aggregate US Bonds
 - · Inflation Protected Bonds
 - · Foreign Bonds
 - · Large Cap Equities
 - · Mid Cap Equities
 - · Small Cap Equities
 - · International Equities
 - · Diversified Emerging Markets
 - · Real Estate
 - Natural Resources
- Accurate and appropriate indexing representation of the underlying portfolio of the respective mutual fund per the chosen asset class.

4. Prior quarter and YTD variances in:

- · Fund performance
- · Morningstar Rating
- · Five year weighted peer performance grades
- · Fund operational expense ratios
- · Fund manager changes

5. Alerts

- · Funds marked for outbound removal
- · Funds marked for inbound replacement
- Asset class rotation announcements (by investment committee)
- Timelines for communications regarding inbound/outbound funds, and scheduled migration of member holdings
- Funds closed to new investment designated by fund family
- Funds available only to existing shareholders designated by fund family
- Funds merged or acquired as designated by Schwab and fund family

Summary

HealthEquity Advisors, LLC has implemented a robust process and methodology to provide the investing members with high quality funds covering a diversified selection of 10 asset classes. This will help members construct portfolios with a view toward minimizing risk and maximizing growth. HSA balances are growing rapidly, and may someday begin to approach 401(k) account levels for certain members. In order for members to feel confident investing their HSA dollars, HealthEquity Advisors, LLC has put in place technology and investment professionals to provide a trusted level of oversight.

Should you have any questions about our selection and oversight process, please contact HealthEquity Advisors, LLC at advisor@healthequity.com.

Investments are subject to risk, including the possible loss of the principal invested and are not FDIC or NCUA insured, or guaranteed by HealthEquity, Inc. HSA holders may select Vanguard funds for investment through the HealthEquity investment platform but HealthEquity, Inc. does not provide investment advice. HealthEquity Advisors, LLCM, a wholly owned subsidiary of HealthEquity, Inc. and an SEC-registered investment adviser, provides web-based investment advice to HSA holders that subscribe for its services (minimum thresholds and additional fees apply). HealthEquity Advisors, LLC also selects the mutual funds referenced in this document and may be offered to HSA holders through the HealthEquity, Inc. platform. Registration does not imply endorsement by any state or agency and does not imply a level of skill, education, or training. Investing may not be suitable for everyone. You should carefully consider the investment objectives, risks, charges and expenses of any mutual fund before investing. A prospectus and, if available, a summary prospectus containing this and other important information can be obtained by visiting the Vanguard website at vanguard.com. Please read the prospectus carefully before investing.

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