



Memo

Date: March 29, 2024
From: Barry Garrett, Chief Compliance Officer
Regarding: VCM Changes to ADV Forms Filed March 29, 2024

The following updates to Victory Capital's Form ADV were made in our **March 29, 2024** annual filing. The filed copy of our ADV and additional information about Victory Capital Management Inc. is available on the SEC's website at: <https://adviserinfo.sec.gov/firm/summary/106189>.

- Removed references to INCORE franchise as assets related to this franchise were sold and other assets were integrated into the Victory Income Investors franchise.
- Added disclosure under Item 8 related to strategies now under Victory Income Investors that were retained from INCORE franchise.
- Removed reference to "Crestview Partners II GP, LP (and its affiliated funds)" as it no longer holds more than 25% of the shares of VCTR.
- Removed reference to RS Investments (Hong Kong) Limited in Item 10 as this entity is in the process of being liquidated.