



Wilmington Trust Fiduciary Services Company Collective Investment Trust for Employee Benefit Plans

Portfolio Disclosure Document

Strategic Growth Portfolio

Objective

To generate a total return in excess of the benchmark over a full market cycle.

Benchmark

Russell 1000® Growth Index

Method

To invest in securities of large- and mid-cap companies that appear to offer above-average, high-quality earnings growth potential.

Permissible Investments

The Portfolio may invest in:

1. Common stock, American Depositary Receipts ("ADRs"), Real Estate Investment Trusts ("REITs") and other securities that are traded on a recognized U.S. exchange, through NASDAQ, or on the U.S. over-the-counter markets;
2. Derivative instruments, synthetic securities, including options (both exchange-traded and over-the-counter) and futures contracts;
3. Short-term, cash equivalent investments, including:
 - a. Obligations of, guaranteed by or insured by the U.S. Government, its agencies or instrumentalities;
 - b. Obligations of U.S. banks or savings associations (including certificates of deposit and bankers' acceptances) which are fully insured by the Federal Deposit Insurance Corporation; and
 - c. Commercial paper or variable amount master notes issued by companies that, at the time of purchase, have an issue of outstanding debt securities rated as "investment grade" by Standard & Poor's Ratings Group ("S&P") (BBB- or better), Moody's Investor Services Inc. ("Moody's") (Baa3 or better) or Fitch Ratings Service ("Fitch") (BBB- or better) or commercial paper rated A-1 by S&P, P-1 by Moody's or F1 by Fitch, with split-rated securities considered to have the middle credit rating;
4. Shares of a registered investment company that is not sponsored by the Trustee or any affiliate of the Trustee and that has an investment objective consistent with the overall investment objectives of the Portfolio. In the event the Trustee purchases shares of a registered investment company sponsored by the Adviser or an affiliate of the Adviser, the Trustee will reimburse the Portfolio in an amount equal to the investment advisory fee allocatable to the interest of the Portfolio in the registered investment company;

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5. An interest in a Portfolio established by the Trustee under the "Collective Investment Trust for Employee Benefit Plans," none of which shall have an investment advisory or management fee; and
6. An interest in a collective investment fund maintained by a bank or trust company other than the Trustee and which has an investment objective consistent with the overall investment objectives of the Portfolio.
4. The Portfolio's investments may not exceed 5% of the issuer's total market capitalization.
5. The Portfolio may not make short sales or maintain a short position.
6. The Portfolio may not purchase any security subject to a trading restriction (e.g., defined as any Rule 144A eligible securities).
7. The Portfolio may not invest in Wilmington Trust Corporation or M&T Bank Corporation securities.

A portion of the Portfolio may remain uninvested pending settlement of securities trades.

Investment Restrictions

1. No more than the larger of 5% or the benchmark plus 2%, at time of last purchase, of the Portfolio's value may be invested in the securities of any one issuer, except for the debt securities of the U.S. Government, its agencies or instrumentalities, or shares of a registered investment company or an interest in a collective investment fund, which may be purchased without limit. The Portfolio shall sell securities of any issuer (except for debt securities of the U.S. Government, its agencies or instrumentalities, or shares of a registered investment company or an interest in a collective investment fund) that exceed 10% of the value of the Portfolio's assets within 30 days after the month in which the position first exceeds the greater of (a) the benchmark plus 2% or (b) 10%.
2. No more than 25%, at time of last purchase, of the Portfolio's value may be invested in dollar-denominated securities of foreign issuers.
3. No non-dollar denominated securities can be purchased.
8. The Portfolio may not hold issues received as a result of corporate actions which do not meet the permissible investment criteria or are in violation of an investment restriction. Such issues must be sold within 30 days after the end of the month in which they were received.

This document is part of and should be read in conjunction with the Declaration of Trust of the Wilmington Trust Fiduciary Services Company Collective Investment Trust for Employee Benefit Plans. Wilmington Trust Fiduciary Services Company does not guarantee that actual results will meet the Objective, and the statement of the Objective should, under no circumstances, be construed as a guarantee, promise, or commitment that such results will actually be achieved or that there will not be a loss in value of the Portfolio. Units of the Portfolio are not deposits or obligations of Wilmington Trust Fiduciary Services Company or any bank. The value of the Units or Portfolio assets is not guaranteed by the Federal Deposit Insurance Corporation or by any other Governmental agency or instrumentality. The Units are subject to investment risk, including illiquidity and possible loss of principal invested.

Amended effective November 28, 2011

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