OneAmerica Securities, Inc.

INVESTMENT ADVISOR CODE OF ETHICS AND EMPLOYEE PERSONAL TRADING

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TABLE OF CONTENTS

INTRODUCTION **4**

WHO IS COVERED BY THE CODE **4**

ELEMENTS OF THE CODE **4**

DETAILS ABOUT THE CODE **5**

- STANDARD OF BUSINESS CONDUCT 5
- PROHIBITED CONDUCT 5
- ACTIVITIES TO BE APPROVED BY THE CCO OR HIS/HER DESIGNEE 6
- PRIVACY OF CLIENT INFORMATION & DISCLOSURE TO CLIENTS 6
- GIFTS & CONFLICTS OF INTERESTS 7
- SERVICE AS A DIRECTOR 7
- REPORTING OF CODE VIOLATIONS 7
- SUPERVISION AND ENFORCEMENT OF THE CODE 7
- DOCUMENT RETENTION 8
- INSIDER TRADING POLICY & NON-PUBLIC INFORMATION 8
- PERSONAL ACCOUNT TRADING POLICIES FOR ACCESS PERSONS 10

INTRODUCTION

In maintaining an environment of openness, honesty and integrity are of utmost importance at OneAmerica Securities, Inc. ("OAS" or the "Firm"), the Registered Investment Advisor ("RIA") has adopted a written code of ethics pursuant to Rule 204A-1 of the Investment Advisers Act of 1940. The purpose of this Investment Advisor Code of Ethics ("The Code") is to identify the ethical and legal framework in which OAS Investment Advisor Representatives ("IARs") are required to operate and to highlight some of the guiding principles for upholding the Firm's standard of business conduct. Investment Advisor Representatives should feel comfortable expressing their opinions and alerting senior management to any concerns with respect to the Firm's business, operations, or compliance.

The Code does not and cannot address each potential conflict of interest. Ethics and faithful discharge of the Firm's fiduciary duties require adherence to the spirit of The Code. All IARs must be aware that a variety of activities, including, but not limited to, personal securities transactions and accepting favors from broker-dealers or other advisors, could involve conflicts of interest and/or an abuse of a person's position with the Firm. If there is any doubt about the application, or potential application, of The Code or any of the Firm's compliance policies and procedures the Chief Compliance Officer ("CCO") or his/her designee should be consulted.

WHO IS COVERED BY THE CODE

All OAS IARs are expected to abide and be bound by the Code. All OAS IARs must acknowledge receipt of the Code within 10 days of association with OAS. In addition, on an annual basis, OAS IARs must attest that he or she has reviewed the Code and will comply with all Firm policies and procedures.

ELEMENTS OF THE CODE

1. Standard of Business Conduct
2. Prohibited Conduct
3. Activity Subject to Approval
4. Privacy of Client Information & Disclosure of the Code to Clients
5. Gifts & Conflicts of Interest
6. Service as a Director
7. Reporting of Violations
8. Supervision & Enforcement of the Code
9. Document Retention
10. Insider Trading & Non-Public Information
11. Personal Securities Transactions

DETAILS ABOUT THE CODE

STANDARD OF BUSINESS CONDUCT

It is the responsibility of all IARs to ensure that OAS conducts its business with the highest level of ethical standards and in keeping with its fiduciary duties to OAS clients. Investment Advisor Representatives have a duty to place the interests of OAS clients first, and to refrain from having outside interests that conflict with the interests of OAS clients. To this end, IARs are required to maintain the following standards:

1. Compliance with all Covered Laws, including, but not limited to, federal securities laws;
2. Compliance with OAS compliance policies and procedures, as shall be updated from time to time;
3. Honest and fair dealings with clients;
4. Disclosure to OAS and clients of potential and actual conflicts of interest;
5. Exercise diligence in making investment recommendations or taking investment actions, including but not limited to maintaining objectivity, considering the suitability of an investment for a particular client and keeping appropriate records;
6. Obtain prior written consent from the Firm for all outside business activities;
7. Immediate disclosure to OAS management of any matters that could create a conflict of interest, constitute a violation of any government or regulatory law, rule or regulation or constitute a violation of OAS policies and procedures.

PROHIBITED CONDUCT

OAS IARs must avoid any circumstances that might adversely affect, or appear to affect, their duty of complete loyalty to OAS clients. Neither the Firm nor any of its IARs shall:

1. Employ any device, scheme or artifice to defraud, or engage in any act, practice, or course of conduct that operates or would operate as a fraud or deceit upon, any client or prospective client or any party to any securities transaction in which the Firm or any of its clients is a participant;
2. Make any untrue statement of a material fact or omit to state to any person a material fact necessary in order to make a statement of the Firm, in light of the circumstances under which it is made, materially complete and not misleading;
3. Engage in any act, practice or course of business that is fraudulent, deceptive, or manipulative, particularly with respect to a client or prospective client;
4. Engage in any manipulative practices;
5. Cause OAS, acting as principal for its own account or for any account in which the Firm or any person associated with the Firm has a beneficial interest, to sell any security to or purchase any security from a client in violation of any applicable law, rule or regulation;

6. Engage in any form of harassment;
7. Unlawfully discuss trading practices, pricing, clients, research, strategies, processes or markets with competing firms or their personnel; or
8. Engage in insider trading (see details on page 6 of The Code).

ACTIVITIES TO BE APPROVED BY THE CCO OR HIS/HER DESIGNEE

Any exceptions must be reported to the CCO or his/her designee and written approval for continuation must be obtained from the CCO or his/her designee: The following are potentially compromising situations, which must be avoided:

1. Participation in civic or professional organizations that might involve divulging confidential information of OAS.
2. Investing in, holding outside interest in or holding a directorship in any client's firm, vendors, customers or competing firms. This includes financial speculations, where such investment or directorship might influence in any manner a decision or course of action of the Firm.
3. OAS IARs must not engage in ANY financial transaction with any of the Firm's vendors, investors or other IARs without prior written consent from the CCO or his/her designee, including but not limited to: providing any rebate, directly or indirectly, to any person or entity that has received compensation from the Firm; accepting, directly or indirectly, from any person or entity, other than the Firm, compensation of any nature as a bonus, commission, fee, gratuity or other consideration in connection with any transaction on behalf of the Firm; beneficially owning any security of, or have, directly or indirectly, any financial interest in, any other organization engaged in securities, financial or related business, except for beneficial ownership of not more than one percent (1%) of the outstanding securities of any business that is publicly owned.
4. For outside business purposes, using or authorizing the use of any inventions, programs, technology or knowledge, which is the proprietary information of the Firm.
5. Engaging in any conduct that is not in the best interest of the Firm, its clients, or might appear to be improper.

PRIVACY OF CLIENT INFORMATION & DISCLOSURE TO CLIENTS

Investment Advisor Representatives must comply with the Firm's Privacy Policy as set forth in the OAS Written Supervisory Procedures Manual ("WSPM"). All information relating to clients' portfolios and activities and to proposed recommendations is strictly confidential. Consideration of a particular purchase or sale for a client account may not be disclosed, except to authorized persons.

Upon request the Firm must furnish copies of its full Code of Ethics Policy to clients. The Form ADV Part 2A gives a general description of the Firm's Code of Ethics Policy. See the OAS WSPM for information regarding the distribution of disclosure documents to clients.

GIFTS & CONFLICTS OF INTERESTS

The Firm has a duty to disclose potential and actual conflicts of interest to its clients. Investment Advisor Representatives may not use any confidential information or otherwise take inappropriate advantage of their positions for the purpose of furthering any private interest or as a means of making any personal gain. Additionally, IARs and their immediate families will not be permitted to give or receive cash or anything of value in excess of $100 per individual per year to any person, principal, proprietor, employee, agent or representative of another firm. However, it is common within the Firm's industry for lunches, dinners and/or conferences to be hosted by research analysts, brokerage firms or other service providers. Attendance at these events by IARs is subject to review by the CCO or his/her designee.

SERVICE AS A DIRECTOR

No Supervised Person may serve as a director of a publicly held company without prior approval by the CCO or his/her designee. Approval will be based upon a determination that the IAR's service as a director would not be adverse to the interests of any client.

REPORTING OF CODE VIOLATIONS

Investment Advisor Representatives are required to promptly report all actual or potential conflicts of interest, violations of any Covered Law or violations of OAS policies and procedures. Such reports shall be made to the CCO or his/her designee and may be made on a confidential or non-confidential basis, orally in person or by phone, or in writing hand delivered or sent by e-mail or fax. Any retaliatory action taken against a person who reports a violation or potential violation shall be a violation of The Code.

Further, any IARs who, in good faith, report a violation of The Code or of securities laws shall not suffer harassment, retaliation, or adverse employment consequences. Any employee, director, or officer who retaliates against someone who has reports a violation in good faith is subject to disciplinary action. This policy is to encourage and enable IARs to raise concerns within OAS rather than seeking resolution outside of OAS.

SUPERVISION AND ENFORCEMENT OF THE CODE

The CCO or his/her designee is responsible for ensuring adequate supervision over the activities of all persons who act on the Firm's behalf in an effort to prevent and detect violations of The Code by such persons. The CCO or his/her designee may determine appropriate person(s) to help administer The Code. Specific duties include, but are not limited to:

1. Adopting, implementing and enforcing the Firm's compliance and supervisory procedures and controls to ensure compliance with the Covered Laws;
2. Reasonably ensuring that all IARs understand the Firm's compliance policies and procedures;
3. Establishing an annual review of the Firm's operations and its compliance policies and procedures to ensure that the Firm has a system designed to provide reasonable assurance that the Firm's compliance policies and procedures are effective and are being followed; and
4. Review personal securities transactions and reports of access persons (as defined below).

Upon discovering that any person has failed to comply with the requirements of this Code of Ethics, the Firm may impose on that person whatever sanctions the CCO and management consider appropriate under the circumstances, including censure, suspension, limitations on permitted activities, monetary fines, or termination.

DOCUMENT RETENTION

The CCO or his/her designees will retain copies of all revisions to the Firm's Code of Ethics policies and related reports in accordance with the recordkeeping provisions as stated in the OAS WSPM.

INSIDER TRADING POLICY & NON-PUBLIC INFORMATION

Insider trading (as defined below) is prohibited by law. Penalties associated with insider trading can be severe to both the individual and the Firm even if the Supervised Person did not personally benefit from the violation. Investment Advisor Representatives are required to report all business, financial or personal relationships that may result in access to material, non-public information to the CCO or his/her designee. An Outside Business Activity Disclosure form must be submitted within 10 days of association with OAS, promptly upon any changes and annually thereafter. Investment Advisor Representatives are prohibited from trading, personally or on behalf of others, while in possession of non- public information. Investment Advisor Representatives also may not communicate non-public information to others who may act on such information. It is important to avoid even the appearance of impropriety and to exercise good judgment when relating information to others that is obtained as a result of your involvement with the Firm.

"Material Information" is generally defined as:

- Information for which there is a substantial likelihood that a reasonable investor would consider it important in making his or her investment decisions, or information which, if

disclosed, could be viewed by a reasonable investor as having significantly altered the "total mix" of information available; or

- Information that, if publicly disclosed, is reasonably certain to have a substantial effect on the price of the company's securities; or
- Information that could cause insiders to change their trading patterns.

Information that IARs should consider material includes, without limitation, changes in dividend policies, earnings estimates, changes in previously released earnings estimates, significant merger or acquisition proposals or agreements, major litigation, liquidity problems, and significant new products, services or contracts.

"Market Information" such as information concerning an impending securities transaction (e.g., private transactions in public entities (PIPEs), tender offers, exchange offers, corporate reorganizations, merger and acquisition activities, etc.) may also be "material." In addition, pre-publication information regarding reports in the financial press may be material.

There is no simple test that exists to determine when information is material. Such assessments of materiality involve highly fact- specific inquiries and are often challenged with the benefit of hindsight. As such, a Supervised Person should seek guidance from the CCO or his/her designees if there is any question or doubt in their mind.

"Non-public Information". Information is "non-public" until such time as it has been effectively communicated to investors in the marketplace. One must be able to point to some fact to show that the information is generally public. For example, information found in a report filed with the SEC or other government agency, or appearing in *The Wall Street Journal* or other publication of general circulation (i.e., information included in press releases issued by the issuer of the securities) would be considered public. **Information relating to our business should generally be considered nonpublic, unless the information is generally known in the marketplace.**

Who is an "Insider"? The concept of "insider" is broad. It includes officers, directors, and employees of a company. Please note that a person does not have to be an executive or in senior management to be an insider. In addition, a person can be a "temporary insider" if he or she enters into a special confidential relationship in the conduct of a company's affairs and as a result is given access to information solely for the company's purposes. Temporary insiders can also include, among others, a company's law firm, accounting firm, consulting firm, banks, and the employees of such organizations.

Insider Trading. Insider trading is acting upon, misusing or communicating material, non-public information either personally or on behalf of others even if personal benefit is not derived.

Investment Advisor Representatives are prohibited from engaging in any insider trading activity. Questions relating to insider trading should be directed to the CCO or his/her designee. The CCO or his/her designee is responsible for making the final determination regarding whether the information is material or non-public and could be considered insider information.

PERSONAL ACCOUNT TRADING POLICIES FOR ACCESS PERSONS

INTRODUCTION

The Director of Advisory Services is required to maintain current and accurate records of all personal securities transactions in which access persons (as defined below) have a direct or indirect beneficial interest and is responsible for reviewing such records.

DEFINITIONS

For purposes of this personal account trading policy the following terms shall have the meanings set forth below:

Access Person. Any supervised person: (A) who has access to nonpublic information regarding any clients' purchase or sale of securities, or nonpublic information regarding the portfolio holdings of any reportable fund, or, (B) who is involved in making securities recommendations to clients, or who has access to such recommendations that are nonpublic.

Security Types. The term "security" includes mutual funds, exchange-traded funds ("ETFs"), stocks, partnership interests, options, rights, warrants, futures, contracts, convertible securities or other securities that are related to securities in which the Firm's clients may invest or as to which the Firm may make recommendations. Transactions in Private Placements and other limited offerings also require pre-approval from the CCO or his/her designee. Transactions in Initial Public Offerings ("IPOs") are not permitted. The following are not considered reportable securities and are exempt from this policy: US Government debt obligations, money market instruments and unaffiliated open-end mutual funds and unit investment trusts if invested only in unaffiliated mutual funds.

Beneficial Interest. The term "beneficial interest" of securities is broad. It includes not only securities that an Access Person owns directly, and not only securities owned by others specifically for the employee's benefit, but also (i) securities held by the Access Persons' spouse, minor children and relatives who live full time in his or her home; and (ii) securities held by another person if by reason of any contract, understanding, relationship, agreement or other arrangement the Access Person obtains an interest substantially equivalent to ownership.

PRE-APPROVAL FOR PERSONAL TRADING

As is consistent with OAS Broker-Dealer requirements, Access Persons are required to obtain

Pre-Approval before executing personal securities transactions for Private Placements and other limited offerings.

PROHIBITED PERSONAL TRADING ACTIVITY

Access Persons are prohibited from using nonpublic information regarding portfolio holdings, model changes, or client transactions for their personal benefit. Access Persons are prohibited from using advance knowledge to trade ahead of or otherwise benefit from such knowledge. Transactions in Initial Public Offerings (“IPOs”) are not permitted.

REPORTING REQUIREMENTS

Access Persons are required to report personal account transactions and holdings to the OAS CCO or his/her designee as follows:

1. Initial Report. An Access Person shall, no later than 10 days after the Access Person begins a relationship with the Firm, notify the Firm in writing of their previously established account(s) and their intention to maintain the account.
2. New Accounts and Account Closures. Access Persons shall promptly notify the CCO or his/her designee in writing PRIOR to opening a new account. Additionally, access persons shall promptly notify the firm of the closing of an account.

Exemptions: The following are not considered reportable securities and are exempt from this policy: U.S. Government debt obligations, money market instruments, unaffiliated open-end mutual funds and unit investment instruments if invested only in unaffiliated mutual funds.

Review of Reports and Transaction Records. Upon approval of an outside account(s), OAS will request that the other firm send duplicate confirmations and statements to OAS. The CCO or his/her designee shall review the confirmations and statements for any evidence of improper trading activities or conflicts of interest by Access Persons (including, but not limited to, front running, scalping, and other practices that constitute or could appear to involve abuses of your position with the Firm such as unusual patterns or activity and checking against a restricted trading list if applicable).

Record Keeping. Duplicate confirmations and statements received by the Firm will be reviewed and filed by the following month end.