

OAS Disclosure Statement

Products and financial services provided by
OneAmerica Securities Inc.
a OneAmerica® company
a Registered Investment Advisor
Member FINRA, SIPC
One American Square, P.O. Box 1984
Indianapolis, IN 46206-1984



OneAmerica Securities, Inc. (OAS, Firm, we) is required by law to provide specific disclosures to you. This OAS Disclosure Statement (Disclosure) satisfies the requirements prescribed under the Disclosure Obligation of Regulation Best Interest to accompany any recommendation that has been made to you. The information contained in this document is meant to build upon the information that was presented to you in the Client Relationship Summary (Form CRS). Additionally, this Disclosure satisfies the requirements prescribed under the Department of Labor's Prohibited Transaction Exemption 2020-02.

This Disclosure summarizes the type of recommendations, investments, and fees associated with the various accounts, products, and services available to you. This Disclosure does not constitute a modification of or amendment to the charges, fees, and terms set forth in account agreements and disclosures provided by OAS and the investment company, insurance company, 529 plan provider, clearing firm, custodian, or registered investment adviser that maintains and administers your account.

Material Facts Regarding the Scope and Terms of Your Relationship with OAS

The Capacity in Which We Act

OAS is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and registered investment adviser and can offer both brokerage and investment advisory services. All recommendations regarding your brokerage account, your account opened directly with an investment company and/or your account opened directly with an insurance company will be made in a broker-dealer capacity. All recommendations regarding your advisory account will be made in an advisory capacity. When we make a recommendation to you, we will expressly tell you which account we are discussing and the capacity in which we are acting.

The Type and Scope of Services We Provide

OAS is an introducing broker-dealer and a registered investment adviser. We offer our customers access to brokerage, mutual fund, variable annuity, variable life and investment advisory accounts, products and services.

Broker-Dealer Programs and Services

When you engage OAS to provide introductory brokerage services through its clearing firm, Pershing, LLC (Pershing), or a mutual fund, 529 plan, variable annuity or variable life account held directly at the investment or insurance company with which we have a servicing agreement, your representative will make investment recommendations related to buying and selling securities on a transaction basis. We are required to trade securities in your account as you instruct, deal fairly with you, and make recommendations that are in your best interest based on, among other things, your investment objectives, risk tolerance, liquidity needs, time horizon, financial needs, tax status and other financial information you have disclosed to us. We will not monitor the performance of your account on a minimum prescribed schedule. Your representative may periodically review the holdings in your account for the purposes of determining whether to make new recommendations to buy or sell securities.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (*give prudent advice*);
- Never put our financial interests ahead of yours when making recommendations (*give loyal advice*);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Brokerage Accounts

In a Pershing brokerage account, OAS will serve as the introducing broker-dealer for either a cash account or margin account. In a cash account, you will pay for the securities you purchase in full. A margin account allows you to borrow cash from Pershing to purchase securities. A separate agreement will be required to open a margin account through us. As an introducing broker-dealer, we take your instruction to place orders to buy and sell securities in your account, deposit and withdraw funds from your account, and transfer and wire funds from your account. You will have access to a wide range of stocks, exchange-traded funds (ETFs), bonds, certificates of deposits (CDs), preferred stocks, mutual funds, closed-end funds and unit investment trusts (UITs). You will pay commission-based fees for trade execution and/or sales charges. There are costs associated with maintaining a brokerage account charged by Pershing for services rendered, which include but are not limited to account setup, maintenance and closing, clearance and settlement, financial products and services, credit services, trading services, custody services, mutual funds and money market funds and technology. You will receive the *Schedule of Miscellaneous Account and Service Fees* when you open your account. This document includes a comprehensive list, including the cost and frequency of charge for each account maintenance and cash management service provided by OAS and/or Pershing.

Directly-Held Mutual Funds and 529 Plans

In an account held at an investment company or 529 plan provider, OAS will serve as the broker-dealer of record for your account. This allows us to take your instruction to place orders to buy and sell securities in your account. You will have access to that specific investment company's or 529 plan provider's line-up of mutual fund offerings or investment portfolios. You will pay commission-based sales charges and ongoing fees that will vary depending on the share class you purchase. Many mutual funds offer various sales charges, discounts or waivers depending on the terms of the most recent prospectus. Additional administrative costs to maintain your account will also be disclosed in the prospectus or account opening documentation. You should carefully read the prospectus provided to you by your representative before investing.

Directly-Held Variable Annuities and Variable Life Contracts

In an account held at an insurance company, OAS will serve as the broker-dealer of record for your account. This allows us to take your instruction to place orders to buy and sell securities in your account. You will have access to that specific insurance company's line-up of variable annuity and/or variable life product offerings. You will pay commission-based sales charges that will vary depending on the share class you purchase. The administrative costs associated with holding your variable annuity or variable life product are disclosed in the most recent prospectus. The specific terms and expenses for your variable annuity and/or variable life product are set forth in the contract between you and the insurance company. You should carefully read the prospectus provided to you by your representative before investing.

Investment Advisory Programs and Services

When you engage OAS to provide investment advisory services, your representative will provide you investment advice, give you access to discretionary asset management services and can create a financial plan in accordance with the investment objectives, guidelines and restrictions determined and developed by you and your representative. For each program described below, your representative will provide you ongoing advice and active monitoring of your investments. Your representative will meet with you at least one time per year to review the performance of your holdings.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (*give prudent advice*);
- Never put our financial interests ahead of yours when making recommendations (*give loyal advice*);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Account Managers

OAS offers a variety of different investment management programs through arrangements with Envestnet, Inc., Sawtooth Solutions, LLC and Lockwood Advisors, Inc. (collectively referred to as Account Managers). The Account Managers are unaffiliated registered investment advisers who offer investment advisory and investment management programs to you. OAS may provide customized investment advisory and administrative services to you, but it does not maintain custody of the individual funds or other assets owned by you. The Account Managers have discretionary authority to direct the investments and holdings in your account based on the investor profile that you and your representative create. The Account Managers can offer Discretionary Management programs, Separately Managed Account programs and Unified Managed Account programs. Any program you select will be a wrap-fee program, whereby the management fee and the administrative fee are combined. All additional costs for custody, clearing, ticket charges, commissions, transactions and execution (collectively Brokerage Fees) charged by the clearing firm, Pershing, are covered by OAS and are not incurred by you. Pershing also charges an account maintenance fee that you will pay on an annual basis. Please refer to the OAS Form ADV Part 2A and its Form ADV Part 2A Appendix, which provide additional disclosures and details on the programs offered by the Account Managers and the fees you will pay. We will provide you separate disclosure statements for the Account Manager you select.

Third-Party Asset Managers

OAS has a wide range of agreements with unaffiliated registered investment advisers (TAMP), which can offer discretionary management of your account. Your representative will gather information about you and then assist you in the selection of the TAMP. We receive asset-based fees for referring clients to the TAMP. This fee is agreed upon by you and your representative. The fee paid to OAS for referring your account to the TAMP is separate and distinct from any fees and expenses charged by the TAMP, which are described in each TAMP's ADV. The fees and expenses may include Brokerage Fees and other fees and expenses incurred for holding certain assets in a portfolio. We will provide you separate disclosure statements for the TAMP you select.

Financial Plans and Consultations

Your representative can offer financial planning services, which include the creation of financial plans and consultations. Following a thorough financial review, a plan will include a detailed analysis and recommendations. Consultations are provided for specific, targeted areas and include a written statement of observations and recommendations. Your representative will charge you a fixed fee to create a financial plan. This fee is mutually agreed upon between you and your representative and varies depending on the scope of the plan and the planning areas to be addressed. These fees are generally paid in full upon delivery of the plan or in two installments. You will not pay a fee if your representative fails to deliver the financial plan. Consulting fees are based on an hourly rate and depend upon the nature and the scope of the consultation, as well as the nature of research required to complete the project. Prior to engagement, you will sign an agreement which provides an estimate of the total fee for services. The estimated fees are generally billed in arrears.

As a registered investment adviser, OAS is obligated to provide specific disclosures as required by applicable law and regulation. Before enrolling in a particular investment advisory program, you should review the applicable program brochure as well as all disclosures that are provided to you. OAS will deliver a copy of its Form ADV Part 2A to you. A copy of OAS's Form ADV can also be accessed at www.oneamericasecurities.com.

The Fees and Costs You will Pay

At OAS, you work directly with your representative to determine a financial strategy that is designed to meet your needs. It is important that you understand the material fees and costs that apply to transactions, holdings and accounts you conduct through and hold with OAS, as they will vary depending on the type of account, the type of transaction and the type of investment(s) held within the account.

Broker-Dealer Accounts

Equity Transactions

Includes common stock, exchange-traded funds, closed-end funds, certain listed preferred stocks and American Depositary Receipts.

You will pay a commission based on the principal value of the trade. A portion of the commission is payable to your representative.

Category	Principal Value	Commission
Share Price under \$1.00	Less than \$1,000	8.4%
	\$1,000 - \$9,999	5.0% + \$34.00
	\$10,000 & over	4.0% + \$134.00
Single Lots & Odd Lots (quantity of 100 shares or less) and Share Price above \$1.00	Less than \$100	8.4%
	\$100 - \$799	2.0% + \$6.40
	\$800 - \$2,499	1.3% + \$12.00
	\$2,500 & over	0.9% + \$22.00
Multi-Round Lots (quantity of 101 shares or more) and Share Price above \$1.00	Less than \$100	8.4%
	\$100 - \$2,499	1.3% + \$12.00
	\$2,500 - \$19,999	0.9% + \$22.00
	\$20,000 - \$29,999	0.6% + \$82.00
	\$30,000 & over	0.4% + \$142.00

Notes – Equity transactions will occur in a Pershing brokerage account. There is a minimum commission charge of \$50.00 per order. The above grid also represents the pricing for no-load mutual fund purchases, for which the minimum commission charge per order is \$25.00.

Fixed Income and UIT Transactions

Includes treasury securities, government agencies, certificates of deposit, corporate bonds, municipal securities, over-the-counter preferred securities, market-linked investments and UITs.

For purchases and sales, you may pay a “mark-up” on top of the security price. A portion of the fee is payable to your representative.

Product	Term	OAS Mark-up	Sales Credit	Percentage Mark-
Agencies Secondary CDs Corporates MBS Municipals	<2 yr.	0.00%	0.20%	2.45%
	2 yr.	0.00%	0.30%	2.45%
	3 - 4 yr.	0.00%	0.40%	2.45%
	5 yr.	0.00%	0.60%	2.45%
	6 - 8 yr.	0.00%	0.80%	2.45%
	9 - 10 yr.	0.00%	1.00%	2.45%
	11 - 25 yr.	0.00%	1.50%	2.45%
	26 + yr.	0.00%	2.00%	2.45%
Treasury Bills	3 mo. - 1 yr	0.00%	0.10%	0.20%
Buys: Treasury Notes/Bonds	<2 yr.	0.00%	0.10%	2.00%
	2 yr.	0.00%	0.20%	2.00%
	3 - 4 yr.	0.00%	0.30%	2.00%
	5 - 6 yr.	0.00%	0.50%	2.00%
	7 - 8 yr.	0.00%	0.70%	2.00%
	9 - 11 yr.	0.00%	0.90%	2.00%
	11 + yr.	0.00%	1.00%	2.00%
Buys: Treasury Strips	0 + yr.	0.00%	0.50%	2.00%
Sells: Treasury Notes/Bonds	<2 yr.	0.00%	0.10%	1.00%
	2 yr.	0.00%	0.20%	1.00%
	3 - 4 yr.	0.00%	0.30%	1.00%
	5 - 6 yr.	0.00%	0.50%	1.00%
	7 - 8 yr.	0.00%	0.70%	1.00%
	9 - 11 yr.	0.00%	0.90%	1.00%
	11 + yr.	0.00%	1.00%	1.00%
Sells: Treasury Strips	0 + yr.	0.00%	0.50%	1.00%
UITs	0 + yr.	Generally, you will pay a maximum sales charge of up to 3.00% and an annual operating charge of up to 0.25%.		

Notes – Fixed income transactions will occur in a Pershing brokerage account. There is a minimum commission charge of \$50.00 per order. The mark-up is based on the principal value of the trade. A mark-up compensates us for transaction execution.

Mutual Fund, Money Market Fund and 529 Plan Transactions Funds that consist of a portfolio of securities that seek to meet an identified objective and are managed by a fund manager.	The fees you will pay or incur vary based on the share class and the fund's own designated pricing schedule. You can find these fees, including the fund's operating expenses, in the fund's prospectus and offering materials. A portion of the fees received are paid to your representative. <table border="1" data-bbox="358 180 1515 863"> <tr> <th>Security & Share Class</th><th>Fees</th></tr> <tr> <td>Mutual fund A shares</td><td> - Generally, you pay an upfront sales charge of 0.00% to 5.75% of the purchase amount, depending on the fund family selected and the size of the purchase. - You will also pay an annual asset-based service or 12b-1 fee generally in the range of 0.20% to 0.50%. </td></tr> <tr> <td>Mutual fund C shares</td><td> - There is no upfront sales charge; however, you will generally pay a larger annual asset-based service or 12b-1 fee of up to 1.00%. - Generally, if you sell the mutual fund within 12 to 18 months of the purchase date, you will pay a Contingent Deferred Sales Charge of up to 1.00%. </td></tr> <tr> <td>Retirement plan mutual fund share classes</td><td> - For various retirement or benefit plans, the share class availability may be determined by the plan sponsor, the size or nature of the plan or other factors. - For R share mutual funds, there is no upfront sales charge; however, you will generally pay a larger annual asset-based service or 12b-1 fee of up to 1.00%. </td></tr> <tr> <td>Money market funds</td><td> - Generally, you will not pay an upfront fee; however, you will pay an annual asset-based service fee up to a maximum of 1.00%. </td></tr> </table> Notes – Mutual fund and money market fund transactions will occur in either a Pershing brokerage account or an account held directly at an investment company. 529 plan transactions will occur in an account held directly with a 529 plan provider. Fees and expenses in a mutual fund, including sales charges paid by the fund to OAS in connection with a purchase by you of fund shares, reduce the net asset value of the fund and the investment return. Actual sales charges and trails, breakpoints, sales waivers, management fees and redemption charges are controlled by each fund's prospectus and vary according to the type of strategy and fund. Please refer to each fund's specific prospectus to understand the particular features of each share class. There are tools available that may help you in making a decision about which share class is best for you. Please visit www.finra.org/fundalyzer.	Security & Share Class	Fees	Mutual fund A shares	- Generally, you pay an upfront sales charge of 0.00% to 5.75% of the purchase amount, depending on the fund family selected and the size of the purchase. - You will also pay an annual asset-based service or 12b-1 fee generally in the range of 0.20% to 0.50%.	Mutual fund C shares	- There is no upfront sales charge; however, you will generally pay a larger annual asset-based service or 12b-1 fee of up to 1.00%. - Generally, if you sell the mutual fund within 12 to 18 months of the purchase date, you will pay a Contingent Deferred Sales Charge of up to 1.00%.	Retirement plan mutual fund share classes	- For various retirement or benefit plans, the share class availability may be determined by the plan sponsor, the size or nature of the plan or other factors. - For R share mutual funds, there is no upfront sales charge; however, you will generally pay a larger annual asset-based service or 12b-1 fee of up to 1.00%.	Money market funds	Generally, you will not pay an upfront fee; however, you will pay an annual asset-based service fee up to a maximum of 1.00%.
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Variable Annuity and Variable Life Transactions Insurance contracts that consist of a portfolio of mutual fund securities that seek to meet an identified objective and are managed by a fund manager.	The fees you will pay or incur vary based on the share class and insurance company issuing the contract. These fees include first-year sales commissions and may include other commissions paid annually in subsequent years. A portion of the fees received are paid to your representative. <table border="1" data-bbox="358 1276 1515 1801"> <tr> <th>Security</th><th>Fees</th></tr> <tr> <td>Variable Annuity</td><td> - Generally, your representative will receive a first-year sales commission of up to 7.50% of each annuity premium and an annual trail commission of up to 2.00% of the value of your variable annuity. - Certain variable annuities do not have trail commission, or only have trail commission if your representative selects a lower first-year sales commission. - Variable annuities have distinct fees paid by you to the insurance company, including an annual asset-based fee of up to 1.50%. These fees reimburse the insurance company for its fee expenses. </td></tr> <tr> <td>Variable Life Contract</td><td> - Generally, your representative will receive a first-year sales commission of up to 130% of the commissionable target premium. - Variable life contracts have distinct fees paid by you to the insurance company, including an annual asset-based fee of up to 1.50%. These fees reimburse the insurance company for its fee expenses. </td></tr> </table> Notes – Variable annuity and variable life transactions will occur in an account held directly at an insurance company. The terms and expenses for variable annuities and variable life contracts, including surrender charges, optional benefit charges and other insurance company expenses, are set forth in a contract between you and the insurance company. All charges associated with the variable annuity or variable life contract are disclosed in the contract and prospectus, and they are paid to the insurance company.	Security	Fees	Variable Annuity	- Generally, your representative will receive a first-year sales commission of up to 7.50% of each annuity premium and an annual trail commission of up to 2.00% of the value of your variable annuity. - Certain variable annuities do not have trail commission, or only have trail commission if your representative selects a lower first-year sales commission. - Variable annuities have distinct fees paid by you to the insurance company, including an annual asset-based fee of up to 1.50%. These fees reimburse the insurance company for its fee expenses.	Variable Life Contract	- Generally, your representative will receive a first-year sales commission of up to 130% of the commissionable target premium. - Variable life contracts have distinct fees paid by you to the insurance company, including an annual asset-based fee of up to 1.50%. These fees reimburse the insurance company for its fee expenses.				
Security	Fees										
Variable Annuity	- Generally, your representative will receive a first-year sales commission of up to 7.50% of each annuity premium and an annual trail commission of up to 2.00% of the value of your variable annuity. - Certain variable annuities do not have trail commission, or only have trail commission if your representative selects a lower first-year sales commission. - Variable annuities have distinct fees paid by you to the insurance company, including an annual asset-based fee of up to 1.50%. These fees reimburse the insurance company for its fee expenses.										
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Investment Advisor Accounts

Asset Fees Management

Includes accounts opened with an Account Manager or TAMP.

You will pay a fee based on a percentage of assets under management. A portion of the fee is payable to your representative.

Fee Type	Fee Range
Advisory Fee	0.40% - 2.00%
Program Fee	0.15% - 1.25%
Product Fee	0.00% - 2.75%

Notes – Fees are generally calculated using the average daily balance of the account, including cash, as of the last business day of the preceding calendar quarter, and they may be paid in advance or in arrears depending on the program selected by you. Fees are not calculated based on a share of capital gains or capital appreciation of the funds or any portion thereof. The fee is determined by your representative and is dependent on the type of account and nature of the investments selected by you as well as the amount of assets under management. Please refer to the OAS Form ADV Part 2A and the separate disclosure statements for the investment advisory program you selected.

Financial Planning and Consulting Fees

For financial planning, you will pay a fixed fee based on the scope of the plan. Consulting fees are based on an hourly rate. A portion of the fee is payable to your representative.

Fee Type	Fee Range
Financial Planning Fee	Up to \$10,000
Consulting Fee	Not to exceed \$250 per hour

Notes – Prior to an engagement to provide financial planning or consulting, you will sign an agreement which provides an estimate of the total fee for services. Fees will vary depending on the nature and the scope of the plan or consultation and will be mutually agreed upon between you and your representative. A fee for a financial plan that exceeds \$10,000 requires written approval from OAS. Please refer to the OAS Form ADV Part 2A.

Material Limitations on Securities and Investment Strategies

Account Balance Requirements

When you open an account with OAS, we do not require a minimum initial investment; we do not require that you maintain a minimum account balance; and we will not charge you additional fees if your account falls below a certain threshold. However, your representative may recommend you open an investment account with an unaffiliated financial institution where an account minimum could be applied. If an account minimum is applicable to your account, it will be disclosed in the prospectus or account disclosure documents you receive. Your representative will also disclose this material fact to you at the time of recommendation.

Licensing and Registration Requirements

As a dually registered firm, OAS can offer both broker-dealer accounts and investment advisory accounts. However, we do not require our representatives to be licensed to recommend both broker-dealer and investment advisory accounts. This means your representative is only permitted to recommend the securities for which he or she is licensed to sell.

Securities licenses held by Firm representatives are administered and governed by the Financial Industry Regulatory Authority (FINRA) or the North American Securities Administrators Association (NASAA). To make recommendations in a broker-dealer capacity, your representative must hold a Series 6 or Series 7. A Series 6 representative may only recommend the purchase and/or sale of mutual funds, variable annuities, variable life policies, unit investment trusts, and 529 plans. A Series 7 representative may recommend the purchase and/or sale of stocks, bonds, exchange-traded funds, mutual funds, variable annuities, variable life policies, unit investment trusts, and 529 plans. To make recommendations in an investment advisory capacity, your representative must be licensed in your state of residence as an investment advisor representative. Qualification requirements vary state-by-state, but typically require a Series 65, 66, or one of five industry-recognized designations in good standing. These designations are the Chartered Financial Analyst (CFA), Certified Financial Planner (CFP), Chartered Financial Consultant (ChFC), Chartered Investment Counselor (CIC), Personal Financial Specialist (PFS). Your representative may use the title, "Financial Advisor" if he or she is appropriately registered to make recommendations in an investment advisory capacity.

The licenses your representative holds may materially limit the investment products, services and account types he or she can recommend to you. Your representative will disclose to you his or her licenses at the time of recommendation. Additionally, you can review the licenses your representative has passed and states in which he or she is registered at <https://brokercheck.finra.org>.

Other Material Facts Regarding the Scope and Terms of Your Relationship with OAS

Basis for Our Recommendations

OAS does not conduct or perform investment management or investment research for you or your representative. We do provide access to several third-party research providers to which your representative can subscribe. When your representative participates in this service, they can obtain market research reports, which they can use to develop your investment strategy.

Our broker-dealer product shelf contains a variety of investment products and we have agreements with a multitude of unaffiliated registered investment advisers with a wide range of investment management programs, philosophies and strategies in order to serve many types of investors. We do not impose any specific investment approach, philosophy or strategy on your representative. Your representative will work with you to develop an investment strategy or recommend an investment management program based on your investment profile and your specific goals and objectives.

Your registered representative is an independent contractor of OAS. From time to time, your representative may have a distinct investment approach. You will work with your representative to identify and select the investment approach that best fits your goals and objectives. If that approach differs from what is contained in this Disclosure, your representative will explain the strategy and the associated risks.

Risks Associated with Our Recommendations

While we will take reasonable care in developing and making recommendations to you, it is important to remember that securities involve risk, and, because of this risk, you may lose money. There is no guarantee that you will meet your investment goals, or that our recommended investment strategy will perform as anticipated. Please consult any available offering documents for any security we recommend for a discussion of the risks associated with that product. We can provide those documents to you or help you to find them.

General Risks – All investments involve risk, the degree of which varies significantly. Investment performance can never be predicted or guaranteed, and the value of your account(s) will fluctuate due to market conditions and other factors. Investments that we recommend and actions that we take to execute transactions for your account(s) are subject to various market, liquidity, currency, economic, geographical and political risks and are not necessarily profitable. You assume the risk of investing in securities and other investments and you could lose all or a portion of their value.

Lack of Diversification – We typically recommend that you diversify your investments across multiple asset classes, issuers, sectors and industries to reduce the additional investment risk frequency associated with concentrated investments. You should understand that the decreased diversification resulting from holding concentrated positions in a single security, sector or asset class typically results in increased risk and volatility, which can result in losses.

Product Level Risks – Please consult the offering documents for any security we recommend for a discussion of the risks associated with the security. If you cannot find these documents, your representative will provide them or help you to find them.

Proprietary Products

Our parent company, American United Life Insurance Company® (AUL) currently has one active variable universal life product, *OneAmerica VUL*, that is approved for new sales. AUL has numerous other variable annuity and variable universal life products that are service-only unless new contributions are permitted.

Description of Material Facts Regarding OAS' Conflicts of Interest

A material conflict of interest exists when OAS or your representative has a conflict of interest that a reasonable person would expect might incline either of us – consciously or unconsciously – to make a recommendation that is not disinterested. We recognize that certain conflicts of interest exist when we do business with you. We have policies, procedures, and oversight in place designed to manage them effectively. Additionally, we expect your representative to maintain the highest standards of ethical behavior in dealing with you. The following describes the conflicts of interest that can arise when we make a recommendation to you.

Investment Recommendations

Rollover Recommendations

Your representative has a conflict of interest in recommending a rollover of assets from your employer's plan or another Individual Retirement Account (IRA) to an account sponsored by OAS. The conflict arises because your representative would likely earn no compensation if you were to leave your assets in your employer's plan or another IRA not affiliated with us.

Proprietary Product Recommendations

Your representative has a conflict of interest in recommending the purchase of, or additional funds being contributed to, a variable annuity or variable life contract issued by AUL, if the contract allows, instead of a contract issued by a third-party. This is because we will generally earn more revenue from the sale of our affiliate's proprietary products, as compared to products issued by third parties.

Product Recommendations

Based on his or her licensure, your representative may recommend different investment product types and different companies within those product types, which may result in more, less, or different types of compensation depending on the products recommended.

Third-Party Payments

We can earn compensation on transactions in your account in the form of third-party payments. The types of third-party payments we receive include commissions and 12b-1 fees.

Commissions

Commissions are a type of transaction-based payment that may be paid to us and your representative as a result of buying or selling an investment in your account. We have a conflict of interest in receiving commission payments on your account because, generally, we would receive no compensation if you were to not purchase the investment. Additionally, the amount of commission paid to us and your representative may vary by company and product type. As commissions are charged per transaction and not based on the value of your account, you will be charged more when there are more trades in your account, and we may therefore have an incentive to encourage you to trade often. For more information, please refer to the section, The Fees and Costs You will Pay.

12b-1 Fees

When you purchase mutual funds through us, the investment company can pay us a 12b-1 fee. The 12b-1 fee is paid out of fund assets to cover the costs of marketing and selling fund shares. OAS and our affiliate, AUL, have a conflict of interest when recommending an additional contribution to a service-only variable annuity or variable universal life contract issued by AUL because AUL earns additional compensation in the form of a 12b-1 fee that is not shared with your representative. The following funds pay us a 12b-1 fee as a percentage of the fund's net assets.

Subaccount Fund	12b-1 Fee	Subaccount Fund	12b-1 Fee
Invesco VI Core Equity Fund	0.25%	Templeton Foreign Securities Fund	0.25%
Invesco VI International Growth Fund	0.25%	Janus Aspen Perkins Mid Cap Value Portfolio	0.25%
American Century VIP Mid Cap Value Fund	0.25%	Janus Aspen Overseas Portfolio	0.25%
Dreyfus IP Technology Growth Portfolio	0.25%	Janus Aspen Balanced Portfolio	0.25%
Dreyfus VIF Appreciation Portfolio	0.25%	Neuberger Berman AMT Mid Cap Growth Portfolio	0.25%
Dreyfus IP Small Cap Stock Index Portfolio	0.25%		0.25%
Fidelity VIP Mid Cap Portfolio	0.25%	Pioneer Equity Income VCT Portfolio	

Additional Compensation We Receive

Concessions and Placement Fees

OAS may receive compensation in the form of a concession or placement fee from product sponsors in connection with transactions in new issues of certificates of deposit, municipal bonds and closed-end funds. We do not share a portion of these payments with your representative.

OAS receives compensation from a mutual fund distributor or other fund affiliate in connection with transactions for which sales charges are waived or under other circumstances as described in a fund's offering documents. This compensation can be as high as 1.00% of the principal value and is generally referred to as a finder's fee or concession. We share a portion of these payments with your representative.

OAS may receive a dealer concession from a UIT sponsor based upon the amount of customer assets invested in a UIT. In certain cases, OAS receives additional payments from a UIT sponsor, also known as volume concessions, based on our aggregate sales volume with such sponsor, which are not shared with your representative. From time to time, in addition to any dealer or volume concession, OAS receives a reallowance of the public offering price per unit on units of certain UITs and structured products sold by OAS during the initial offering period. We share a portion of these payments with your representative.

Cash Sweep and Money Market Sweep

Pershing offers a service to sweep cash held within your brokerage account into an interest-bearing FDIC-insured cash account (ICA). Under its agreement with each bank in which Pershing deposits customer cash, OAS receives a fee from the banks equal to a percentage of the average daily deposit balance in the ICA. This compensation is retained by OAS and is not shared with your representative.

For accounts not eligible for the ICA, cash balances are automatically invested in a money market fund. The money market mutual fund automatic cash sweep program sweeps uninvested cash daily into taxable and tax-exempt money market funds offered by Pershing. The sweep money market funds pay OAS compensation as a percentage of the assets invested in the respective money market funds. These funds generally pay 12b-1 fees higher than other money market funds. The 12b-1 fees and the payer of such fees are set forth in the prospectus of the money market fund. This compensation is retained by OAS and is not shared with your representative.

High Cash Balance Options Program

OAS also offers a High Cash Balance Options (HCBO) program for the ICA-eligible accounts with large amounts of cash to invest (*non-ICA eligible accounts may participate on an exception basis*). ICA-eligible accounts with a minimum of \$250,000 in cash for investment may purchase money market funds and retain the ICA sweep on the account (*the \$250,000 minimum applies to the amount of the cash trade*). These payments are in addition to recordkeeping fees that OAS receives. The compensation is retained by OAS and is not shared with your representative.

Marketing Support/Revenue Sharing Agreements

OAS may receive additional compensation from product sponsors and unaffiliated registered investment advisors referenced in the Investment Advisory Programs and Services section of this Disclosure. This compensation is received through marketing support or revenue sharing agreements with the respective product sponsor or registered investment advisor. The primary purpose of these agreements is to assist OAS in the training and education of its representatives and, in the case of Envestnet, Inc and Sawtooth Solutions, Inc., to integrate account data on our technology systems. In exchange for this compensation, OAS provides access to the product sponsor or registered investment advisor to its representatives through email, conference calls, conferences, and/or agency meetings. The compensation paid to OAS may be a flat fee and/or a percentage of assets sold through OAS or a percentage of OAS client assets held at the product sponsor or registered investment advisor. The percentage paid to OAS varies by product sponsor and registered investment advisor. As a result, OAS benefits more when your representative recommends investing with a product sponsor or registered investment advisor that pays more in marketing support/revenue sharing versus one that pays less or one that does not have any agreement in place with OAS. However, this compensation is retained by OAS and is not shared with your representative. Additionally, payments made to OAS are taken from the assets of the product sponsor and are not charged as a fee or expense deducted from your account.

The percentage and/or fee amount paid to OAS is outlined below:

Variable Annuities

Product Sponsor	Compensation Paid to OAS
Delaware Life	Up to 0.25% on sales
Equitable Life	Up to 0.25% on sales
MEMBERS Life	Up to 0.15% on sales
Nationwide Life	Up to 0.15% on sales
Prudential	Up to 0.20% on sales
Transamerica	Up to 0.25% on sales

Third-Party Investment Advisors

Investment Advisor	Compensation Paid to OAS
Envestnet	Up to 0.10% on certain platform assets
Sawtooth Solutions	Up to 0.10% on certain platform assets
AssetMark Investment Services	Up to 0.10% on sales + \$175,000 annual fee (<i>paid quarterly</i>)

Non-Cash Compensation

Your representative may receive additional compensation from product sponsors. Any such compensation cannot be tied to the sale of a particular product or products. The compensation may include items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives, including services for identifying prospective customers. Product sponsors may also pay for, or reimburse OAS for the costs associated with, education or training events that may be attended by your representative. We also receive reimbursement from product sponsors for technology-related costs associated with investment proposal tools your representative use with you.

Other Conflicts of Interest

Your representative may have conflicts of interest beyond those disclosed in this document. When that is the case, your representative will disclose, where appropriate, any additional material conflicts of interest no later than the time of a recommendation, and that disclosure will be made to you orally.

The Services We Provide to Participants of AUL Retirement Plans

If you are a current or former participant in a group retirement annuity issued by AUL, there are certain material facts regarding the scope and terms of your relationship with us that differ from those contained in the Disclosure.

Recommendations

We may limit the securities, investment strategies and investment management programs your representative can recommend to you. When this is the case, your representative will disclose this material limitation to you orally. Your representative can recommend you rollover retirement plan assets to an individual variable annuity account issued by AUL. Your assets will be deposited into a subaccount with a guaranteed fixed interest rate.

Compensation

Your representative may be an employee of AUL. As an employee of AUL, your representative's compensation structure is different than what is contained in the Disclosure. Your representative is paid a salary by AUL. Additionally, your representative may earn commissions for recommendations made to you. The commission paid to your representative will not exceed 0.24% of the premium or the total assets under management.