

Equity Services, Inc. ("ESI") sells variable annuities and variable life insurance products for a number of different insurance companies, including ESI's affiliate, National Life Insurance Company ("NLIC"). ESI also offers indexed annuities for a number of different insurance companies, including ESI's affiliate, Life Insurance Company of the Southwest ("LSW"). (NLIC and LSW are collectively referred to as "the Affiliates".) Further, ESI offers mutual funds for various mutual fund companies, including ESI's affiliate Sentinel Financial Services Company ("SFSC"). SFSC is a part of Sentinel Investments, which is a group of companies servicing the Sentinel Funds, including a transfer agent and an investment adviser.

Through our Strategic Partner program ("Program"), ESI seeks to establish additional relationships with various participating insurance companies, mutual fund companies, retirement plan programs and investment advisers ("Strategic Partners"). In addition to customary sales commissions, ESI receives marketing support payments from such Strategic Partners whose products and services ESI offers. Marketing support payments are also called "revenue sharing". These payments may be used by ESI as general financial support to offset the costs of product management support and compliance.

The payments are usually calculated as a percentage of sales of, and/or the total assets held in, the Strategic Partners' products. The actual amount received by ESI is negotiated in each case and varies by Strategic Partner. In return for marketing support payments, Strategic Partners receive visibility on ESI's internal web site for representatives and assistance with coordinating access to and educational opportunities for ESI representatives. In addition, ESI and the Strategic Partners agree to provide each other periodic reports. ESI's receipt of marketing support payments creates a potential conflict of interest in the form of an additional financial benefit to ESI in connection with the sale of products from these Strategic Partners.

Marketing support payments are not made directly by you. For mutual funds, marketing support payments are paid by the Strategic Partner or by an affiliate of the Strategic Partner. For annuities and other insurance products, marketing support payments are also paid by the Strategic Partner or its affiliates. For investment advisers, marketing support payments are paid by the investment adviser.

Broker-Dealer Revenue Sharing Agreements

Annuities and variable life insurance

In the case of variable annuities and fixed-index annuities issued by unaffiliated insurance companies, marketing support payments based on sales can range from 10 basis points (0.10%) to 100 basis points (1.00%) of your total purchase amount. If, for example, you invested \$10,000 in an annuity contract through ESI, ESI would be paid up to \$100 for marketing support. Details regarding what each provider pays to ESI are described below.

National Life Insurance Company and Life Insurance Company of the Southwest

With respect to the Affiliates, ESI pays a higher rate of commissions to its representatives on products issued by these entities. In addition to commission payments to ESI's representatives, the Affiliates and ESI also jointly sponsor a field recognition program that provides other cash (e.g., bonuses, employment benefits) and non-cash benefits to ESI's qualifying representatives based on certain levels of sales of variable annuities, indexed annuities and variable life insurance products issued by both the Affiliates, including paid travel and accommodations at training conferences and recognition conventions. ESI is allocated its share of the costs for such benefits. In accordance with rules of the Financial Industry Regulatory Authority ("FINRA"), non-cash benefits under the program are based on the total production of each representative with respect to all variable insurance products sold through ESI (proprietary and non-proprietary), and the credit received by a representative for each variable insurance product sold is equally weighted, regardless of the issuing life insurance company. In addition, NLIC provides retirement, medical and other employee benefits to qualifying ESI representatives. All of these programs are designed to encourage ESI's representatives to sell products through ESI, including the Affiliates' annuity products.

Sentinel Financial Services Company, ESI's affiliate, is also the distributor of the Sentinel Variable Products Trust, which is offered as a sub-account option in the Investor Select Variable Universal Life and the Sentinel Advantage Variable Annuity.

If you want more information about ESI's incentive programs, contact the firm's Compliance Department at 800-344-7437.

The current unaffiliated annuity issuers who are Strategic Partners and their marketing support arrangements are described below

Allianz Variable Annuities

ESI receives marketing support payments in connection with the sale of variable annuities from Allianz or its affiliates. Each year, ESI is paid an annual amount equal to 25 basis points (0.25%) on gross sales (premiums).

Brighthouse (formerly MetLife) Variable Annuities

ESI receives marketing support payments in connection with the sale of variable annuities from Brighthouse or its affiliates that ranges from 20 basis points (0.20%) to 25 basis points (0.25%) on gross sales (premiums).

Great West Variable Annuities

ESI receives marketing support payments in connection with the sale of variable annuities from Great West or its affiliates. Each year, ESI is paid an annual amount equal to 25 basis points (0.25%) on gross sales (premiums).

Jackson National Variable Annuities

ESI receives marketing support payments in connection with the sale of variable annuities from Jackson National or its affiliates. Each year, ESI is paid an annual amount equal to 25 basis points (0.25%) on gross sales (premiums).

Prudential Variable Annuities

ESI receives marketing support payments in connection with the sale of variable annuities from Prudential or its affiliates. Each year, ESI is paid an annual amount that can range from 10 basis points (0.10%) to 15 basis points (0.15 %) on gross sales (premiums).

Transamerica Variable Annuities

ESI receives marketing support payments in connection with the sale of variable annuities from Transamerica or its affiliates. Each year, ESI is paid an annual amount equal to 25 basis points (0.25%) on gross sales (premiums).

Allianz Life Insurance Company Indexed Annuities

ESI receives marketing support payments in connection with the sale of indexed annuities from Allianz Life Insurance Company or its marketing affiliate (Gameplan). Each year, ESI is paid additional compensation based on sales, as reflected in the table below.

Allianz Index Annuity Product	Allianz Marketing Allowance	Gameplan Marketing Allowance	Total Marketing Compensation
222	0.475%	0.00%	0.475%
360	0.475%	0.00%	0.475%
365i	0.475%	0.00%	0.475%
Core 7	0.50%	0.00%	0.50%

American National Insurance Company

ESI receives marketing support payments in connection with the sale of indexed annuities from American National Life or its marketing affiliate (Gameplan). Each year, ESI is paid additional compensation based on sales, as reflected in the table below.

American National Index Annuity Product	American National Marketing Allowance	Gameplan Marketing Allowance	Total Marketing Compensation
Asia 7	0.50%	0.00%	0.50%
Asia 10	0.50%	0.00%	0.50%

Lincoln National

ESI receives marketing support payments in connection with the sale of indexed annuities from Lincoln National or its marketing affiliate (AMG). Each year, ESI is paid additional compensation based on sales, as reflected in the table below.

Lincoln Index Annuity Product	Lincoln Marketing Allowance	AMG Marketing Allowance	Total Marketing Compensation
New Directions 6	0.50%	0.00%	0.50%
New Directions 8	0.50%	0.00%	0.50%
OptiChoice 5	0.50%	0.00%	0.50%
OptiChoice 7	0.50%	0.00%	0.50%
OptiChoice 9	0.50%	0.00%	0.50%
OptiPoint 8	0.50%	0.00%	0.50%
OptiPoint 10	0.50%	0.00%	0.50%

North American Company

ESI receives marketing support payments in connection with the sale of indexed annuities from North American or its marketing affiliate (Gameplan). Each year, ESI is paid additional compensation based on sales, as reflected in the table below.

North American Index Annuity Product	North American Marketing Allowance	Gameplan Marketing Allowance	Total Marketing Compensation
Performance Choice 8 & Plus	1.00%	0.00%	1.00%
Income Choice 10	1.00%	0.00%	1.00%
Retire Choice Ten	0.50%	0.00%	0.50%
Benefit Solutions 10	0.50%	0.00%	0.50%
Benefit Solutions II	0.50%	0.00%	0.50%

Voya Insurance and Annuity Company

ESI receives marketing support payments in connection with the sale of index annuities from Voya Financial or its marketing affiliate (AMG). Each year, ESI is paid additional compensation based on sales, as reflected in the table below.

Voya Financial Index Annuity Product	Voya Marketing Allowance	AMG Marketing Allowance	Total Marketing Compensation
Wealth Builder 6	0.30%	0.00%	0.30%
Wealth Builder 8	0.45%	0.00%	0.45%
Quest 5	0.45%	0.00%	0.45%
Quest 7	0.70%	0.00%	0.70%
Quest Plus	1.00%	0.00%	1.00%

Mutual Funds and Unit Investment Trusts

Sentinel Funds

ESI receives marketing support payments in connection with the sale and retention of Sentinel Funds mutual funds from Sentinel Financial Services Company ("Distributor"), the principal underwriter for the Sentinel Funds and an affiliate of ESI. Distributor pays ESI 15 basis points (0.15%) of the gross amount of the sale, and 5 basis points (0.05%) on the average daily balance of assets. In addition to commission payments to ESI's representatives, sales of Sentinel Funds are credited to the field recognition program sponsored by the Affiliates and ESI. The field recognition program provides cash (e.g., bonuses, employment benefits) and non-cash benefits to ESI's qualifying representatives, including paid travel and accommodations at training conferences and recognition conventions. In accordance with rules of the Financial Industry Regulatory Authority ("FINRA"), non-cash benefits under the program are based on the total production of each representative with respect to all mutual fund products (proprietary and non-proprietary) sold through ESI, and the credit received by a representative for each mutual fund product sold is equally weighted, regardless of the issuer. In addition, NLIC provides retirement, medical and other employee benefits to qualifying ESI representatives based on Sentinel Fund sales. ESI is allocated its share of its costs for all such benefits and receives a payment from SFSC to offset these expenses. All of these programs are designed to encourage ESI's representatives to sell products through ESI, including the Sentinel Funds. If you want more information about the ESI's incentive programs, contact the firm's Compliance Department at 800-344-7437

Investment Adviser Revenue Sharing Agreements

In the case of investment advisers, marketing support payments based on sales can range from zero to 5 basis points (0.05%) of your total purchase amount and up to 5 basis points (0.05%) on the assets under management on the investment adviser's platform. If, for example, you invested \$10,000 in an investment advisory program through ESI, ESI would be paid up to \$5 for marketing support. In addition, for invested assets that continue to be held in your account a year later, ESI would receive an additional payment of up to 5 basis points (0.05%) annually of the dollar value. For example, on a \$10,000 holding, that would be an additional \$5 per year.

3D Asset Management

ESI receives marketing support payments in connection with assets under management on the 3D Asset Management platform. Each year, ESI is paid an annual amount equal to 5 basis points (0.05%) on assets held on the 3D platform.

Brinker Capital, Inc.

ESI receives marketing support payments in connection with assets under management on the Brinker platform. Each year, ESI is paid an annual amount equal to 5 basis points (0.05%) on assets held on the Brinker platform.

Investnet

Investnet, which is considered a Strategic Partner, does not pay marketing support payments to be in the Program.

Investnet, which is considered a “service provider” under DOL Regulation section 2550.408b-2, charges platform fees to ESI. These platform fees are deducted by Investnet from the investment advisory fees that ESI charges its investment advisory accounts held on the ESI Illuminations platform and are not additional fees charged to the accounts. The fees charged by Investnet to ESI range from 6 basis points (0.06%) to 63 (0.63%) basis points, depending on the ESI Illuminations program and the amount of assets within each program.

Maple Capital

ESI receives marketing support payments in connection with assets under management on the Maple Capital platform. Each year, ESI is paid an annual amount equal to 5 basis points (0.05%) on assets held on the Maple Capital platform.

Pacific Financial Group

ESI receives marketing support payments in connection with assets under management on the Pacific Financial Group platform. Each year, ESI is paid an annual amount equal to 5 basis points (0.05%) on assets held on the Pacific Financial Group platform. Pacific Financial Group also pays ESI a flat annual payment of \$10,000 for participation in the Firm's annual sales conference.

SEI

ESI receives marketing support payments in connection with assets under management on the SEI platform. Each year, ESI is paid an annual amount equal to 5 basis points (0.05%) on assets held on the SEI platform.

Sentinel Funds

ESI receives marketing support payments in connection with assets under management with, and sales of, Sentinel Funds. Each year, ESI is paid an annual amount equal to 5 basis points (0.05%) on assets held with Sentinel Funds, and 15 basis points (0.15%) on new sales.

Other Revenue Sharing Arrangements

National Financial Services, LLC (“NFS”) offers a “No Transaction Fee” list of mutual funds, under which mutual fund offerors pay a participation fee to NFS. NFS shares a portion of this participation fee with ESI. The portion that NFS pays ESI ranges from 10 basis points (0.10%) to 19 basis points (0.19%). This fee is not directly shared with any representative who sells these products. To the extent that these fees are paid to ESI by NFS for Investnet Illuminations Select accounts assets, such fees will be refunded back to the plan's account.

Marketing and Sales Support

In addition to the revenue sharing payments described above, certain product sponsors and investment advisers may make other payments to ESI intended to reimburse the firm's representatives for marketing expenses, such as client seminars, marketing materials, educational and training programs, etc. Marketing reimbursements are directed to ESI and subsequently paid by ESI to its representatives. Reimbursements for educational and training programs are made directly by the product sponsor on behalf of ESI's representatives.

For broker/dealer product sponsors, these marketing support payments are paid out of the sponsor or affiliate's assets, not from the fund or product assets, and are in addition to the sales charges, 12b-1 fees, and other fees and expenses disclosed in the prospectus and/or statement of additional information, each of which are available on request from the sponsor. For investment adviser firms, these marketing support payments are paid out of the adviser or affiliate's assets, not from the account assets, and are made to ESI in addition to annual service fees, and other fees and expenses disclosed in the adviser's Form ADV Part 2A and Form ADV Part 2A-Appendix 1, which are available on request from the investment adviser firm.

In the 2016 calendar year, the average payment/reimbursement made to a recipient representative was approximately \$1535.00. We do not reasonably expect the reimbursements from any company to exceed \$10,000 in any year. Payments were made by the following companies and/or their affiliates: Allianz, AXA, Counterpoint, CUNA Mutual, Fidelity, First Trust, Jackson National Life Insurance Company, JP Morgan, MetLife, Montgomery Brokerage, Mutual of Omaha, Nationwide, Prudential, Security Benefit, Sentinel Investments, Transamerica Life Insurance Company, and W.P. Carey, Inc.