

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".

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 are offered by ESI. Marketing support payments are also called "revenue sharing". These payments are used by ESI as general financial support to offset the costs of product management support.

Unless otherwise noted below, the payments are 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 with the various providers, as described below. 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 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 issued by unaffiliated insurance companies that are included in ESI's Strategic Partner Program, with the exception of Jackson National and the Brighthouse Financial Series variable annuity (described below), variable annuity carriers pay 25 basis points (0.25%), based on your total purchase amount, in marketing support payments. If, for example, you invested \$10,000 in a variable annuity contract through ESI, ESI would be paid \$25 for marketing support. The following variable annuity offerors participate in the Strategic Partner Program: Allianz, Brighthouse, Corebridge, Equitable, Jackson National, Lincoln National, Nationwide, Pacific Life, Prudential, and Transamerica. The following indexed annuity offerors participate in the Strategic Partners Program: Allianz, American National Life, Lincoln National, Nationwide, North American, One America, The Standard, and US Life Insurance Company.

Jackson National and the Brighthouse Financial Series variable annuity, pays ESI 20 basis points (0.20%), based the gross amount of your purchase, in marketing support payments. If, for example, you invested \$10,000 in either a Jackson National or Brighthouse Financial Series variable annuity contract through ESI, ESI would be paid \$20 for marketing support.

Indexed annuity carriers (with the exception of LSW, One America and US Life Insurance, as described below) do not pay additional compensation in the form of revenue sharing, but ESI retains 25, 50 or 100 basis points (0.25%, 0.50% or 1.00%) of the gross concession paid on each product, per the tables below. Therefore, if, for example, a carrier pays a 7% commission on \$10,000 invested in an indexed annuity, ESI would retain either \$25, \$50 or \$100 (in accordance with the tables below), and the representative would receive a percentage (typically ranging from 50%-85%) of the balance of the commission received from the carrier. This practice is commonly referred to as a "haircut" on the gross concession. Indexed annuity sales represent the only product on which ESI retains a haircut.

LSW pays ESI 50 basis points (0.50%) for products with a surrender schedule greater than 7 years or 25 basis points (0.25) for products with a surrender schedule of 7 years or less, based on your purchase amount.

One America differs from ESI's other index annuity provider relationships in that it pays ESI 75 basis points (0.75%), based on your total purchase amount.

US Life Insurance pays ESI 25 basis points (0.25%) on the gross purchase amount of its 5-year Power Index Premier product, and 50 basis points (0.50%) on the gross purchase amount of its 7-year Power Index Premier product. These are the only US Life Insurance indexed annuity product offered through ESI.

These arrangements present a conflict for the Firm in that there is an incentive to promote products from which the Firm retains more revenue, while the conflict to the representative is to sell products from which they receive a greater portion of the commission paid. 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 indexed annuities issued by LSW, including paid travel and accommodations at training conferences and recognition conventions. ESI is allocated its share of the costs for such benefits, but these allocations are partially offset based on the sale of proprietary National Life and/or LSW products. 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 variable insurance products (excluding those sold to residents of Massachusetts and those by Massachusetts-based representatives, in accordance with Massachusetts' Fiduciary Rule) 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 based on sales of NLIC proprietary products. All of these programs are designed to encourage ESI's representatives to sell products through ESI, including LSW's annuity products. Additionally, ESI receives revenue share from National Life from additional deposits into existing SAVA 5 variable annuity contracts, as well as the revenue share from LSW described above.

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

The Firm's unaffiliated annuity Strategic Partners and their marketing support arrangements are described below.

Important Information About Revenue Sharing Agreements for ERISA Plan Sponsors - Continued

Allianz Variable Annuities

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

Brighthouse Financial Variable Annuities

ESI receives marketing support payments of 25 basis points (0.25%) on gross sales (premiums) in connection with the sale of most variable annuities from Brighthouse Financial or its affiliates, except for sales of the Series variable annuity (VA). For sales of the Series VA, ESI receives marketing support payments of 20 basis points (0.20%) on gross sales.

Corebridge Variable Annuities

ESI receives marketing support payments of 25 basis points (0.25%) on gross sales (premiums) in connection with the sales of variable annuities from AIG or its affiliates.

Equitable Variable Annuities

ESI receives marketing payments of 25 basis points (0.25%) on gross sales (premiums) in connection with the sale of variable annuities from Equitable or its affiliates.

Jackson National Variable Annuities

ESI receives marketing support payments of 20 basis points (0.20%) on gross sales (premiums) in connection with the sale of variable annuities from Jackson National or its affiliates.

Lincoln National Variable Annuities

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

Nationwide Variable Annuities

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

Pacific Life Variable Annuities

ESI receives marketing support payments of 25 basis points (0.25%) on gross sales (premiums) in connection with the sale of variable annuities from Pacific Life or its affiliates.

Prudential Variable Annuities

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

Transamerica Variable Annuities

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

Allianz Life Insurance Company Indexed Annuities

ESI retains a portion of the gross commissions received for sales of the Allianz indexed annuity products listed, according to the table below, prior to paying a portion of the remaining commission to the representative.

Allianz Indexed Annuity Product	ESI Portion of Gross Commissions
222	0.50%
Core 7	0.25%

American National Insurance Company Indexed Annuities

ESI retains a portion of the gross commissions received for sales of the American National Insurance Company indexed annuity products listed, according to the table below, prior to paying a portion of the remaining commission to the representative.

American National Indexed Annuity Product	ESI Portion of Gross Commissions
Asia 7	0.50%
Asia 10	0.75%

Lincoln National Indexed Annuities

ESI retains a portion of the gross commissions received for sales of the Lincoln National indexed annuity products listed, according to the table below, prior to paying a portion of the remaining commission to the representative.

Lincoln National Indexed Annuity Product	ESI Portion of Gross Commissions
OptiBlend 5	0.25%
OptiBlend 7	0.50%
OptiBlend 10	0.50%

Important Information About Revenue Sharing Agreements for ERISA Plan Sponsors - Continued

Nationwide Indexed Annuities

ESI retains a portion of the gross commissions received for sales of the Nationwide indexed annuity products listed, according to the table below, prior to paying a portion of the remaining commission to the representative.

Nationwide Indexed Annuity	Revenue Share
New Heights 8	0.25%
New Heights 9	0.25%
New Heights 10	0.25%

North American Company Indexed Annuities

ESI retains a portion of the gross commissions received for sales of the North American Company indexed annuity products listed, according to the table below, prior to paying a portion of the remaining commission to the representative.

North American Indexed Annuity Product	ESI Portion of Gross Commissions
Performance Choice 8 & Plus	0.50%
Income Choice 10	0.50%
Benefit Solutions 10	0.50%

One America Indexed Annuity

ESI receives additional compensation in the form of revenue sharing from One America according to the table below:

One America Indexed Annuity Product	Revenue Sharing
Indexed Annuity Care	0.75%

The Standard Indexed Annuity

ESI receives additional compensation in the form of revenue sharing from The Standard according to the table below:

The Standard Indexed Annuity Product	Revenue Sharing
Index Select Annuity 5	0.25%

US Life Insurance Company Indexed Annuities

ESI receives additional compensation in the form of revenue sharing from US Life Insurance according to the table below:

US Life Insurance Indexed Annuity Product	Revenue Sharing
Power Index Premier (5-year)	0.25%
Power Index Premier (7-year)	0.50%

Mutual Funds and Unit Investment Trusts

Touchstone Advisors ("Touchstone")

ESI receives marketing support payments in connection with the sale and retention of mutual funds from Touchstone Advisors ("Distributor"), with the following exceptions: ESI does not receive marketing support payments on Class I or R6 shares in Touchstone funds, nor for assets in Touchstone Ultra Short Duration fund. For all other Touchstone funds and share classes, 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.

BlackRock Funds ("BlackRock")

ESI receives marketing support payments in the amount of 3 basis points (0.03%) of total sales of certain interval funds offered by BlackRock.

PIMCO Investment Management ("PIMCO")

ESI receives marketing support payments in the amount of 3 basis points (0.03%) of total sales of certain interval funds offered by PIMCO.

Other Arrangements

ESI's field recognition program provides opportunities for representatives to attend training and recognition events. Qualification criteria for attendance at training and recognition events exclude sales related to ERISA-covered accounts and (in accordance with Massachusetts' Fiduciary Rule) sales to residents of Massachusetts or by Massachusetts-based representatives. All of these programs are designed to encourage ESI's representatives to sell products through ESI. 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 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 \$100,000 in an investment advisory program through ESI, ESI would be paid up to \$50. 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 \$100,000 holding, that would be an additional \$50 per year.

Freedom Advisors (formerly 3D/L Asset Management)

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

AssetMark

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

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 account. The fees charged by Investnet to ESI range from 6 basis points (0.06%) to 63 basis points (0.63%), depending on the ESI Illuminations program and the amount of assets within each program, on accounts established prior to January 15, 2018, and 10 basis points (0.10%) for accounts established after that date.

Maple Capital Management

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.

Touchstone Advisors

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

Certain funds available in the ESI Illuminations program pay additional compensation to ESI, such as 12b-1 (trail) fees. Other funds available in the ESI Illuminations program do not pay ESI 12b-1 fees. This creates a conflict of interest, because it creates a financial incentive, specifically the receipt of additional compensation, for ESI to recommend mutual funds with greater expenses.

To mitigate this conflict, 12b-1 fees paid from accounts in the ESI Illuminations and ESI Directions programs are credited back to the customer by the custodian (i.e. NFS). Therefore, ESI no longer receives 12b-1 revenue from accounts in these programs.

ESI also pays the transaction cost for certain purchases, redemptions, and exchanges of Touchstone mutual fund shares, when executed through NFS.

These payments create a conflict of interest in the form of an additional financial benefit in connection with the sale of products from these sponsors.

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, 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, 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 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 calendar year 2024, the average payment/reimbursement made to a recipient representative was approximately \$1,470.00. 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, AssetMark, Equitable, Jackson National, John Hancock, Lincoln Financial, Nationwide, Prudential, and Touchstone Investments.