

VALIC has a policy to discourage excessive trading and market timing. Our investment options are not designed to accommodate short-term trading or “market timing” organizations, or individuals engaged in certain trading strategies, such as programmed transfers, frequent transfers, or transfers that are large in relation to the total assets of a mutual fund. These trading strategies may be disruptive to mutual funds by diluting the value of the fund shares, negatively affecting investment strategies and increasing portfolio turnover. Excessive trading also raises fund expenses, such as recordkeeping and transaction costs, and harms fund performance.

Accordingly, VALIC implemented certain policies and procedures intended to hinder short-term trading. If an investor sells fund shares valued at \$5,000 or more, whether through an exchange, transfer, or any other redemption, the investor will not be able to make a purchase of \$5,000 or more in that same fund for 30 calendar days.

This policy applies only to investor-initiated trades of \$5,000 or more, and does not apply to the following:

- Plan-level or employer-initiated transactions;
- Purchase transactions involving transfers of assets or rollovers;
- Retirement plan contributions, loans, and distributions (including hardship withdrawals);
- Roth IRA conversions or IRA recharacterizations;
- Systematic purchases or redemptions; or
- Trades of less than \$5,000.

As described in a fund’s prospectus or other disclosure documents, in addition to the above, fund purchases, transfers and other redemptions may be subject to other investor trading policies, including redemption fees, if applicable. Certain funds may set limits on transfers in and out of a fund within a set time period in addition to or in lieu of the policy above. Also, an employer’s benefit plan may limit an investor’s rights to transfer.

We intend to enforce these investor trading policies uniformly. We make no assurances, however, that all the risks associated with frequent trading will be completely eliminated by these policies and/or restrictions. If we are unable to detect or prevent market timing activity, the effect of such activity may result in additional transaction costs for the investment options and dilution of long-term performance returns. Thus, an investor’s account value may be lower due to the effect of the extra costs and resultant lower performance. We reserve the right to modify these policies at any time.

# “Revenue Sharing” Program Policy

## Amounts Received from Fund Families



VALIC Retirement Services Company

VALIC offers many investment options to investors for their retirement plans. It is essential for an employer to evaluate these options to select those that best meet the needs of the retirement plan and its participants. We currently offer a broad selection of investment options in our various products, including some of the largest and most well-known fund families. All fund families with whom we have selling agreements have access to our financial advisors to provide training, due diligence or continuing education programs, or other educational presentations and product information for better client service.

It is important for you to know that our financial advisors do not receive additional selling compensation in connection with a participant's choice of investment options offered in the group mutual fund or annuity products. Therefore, there is no incentive for a financial advisor to suggest one fund over another to retirement plan participants.

Many fund families make payments to VALIC for service, marketing, and distribution. These payments, often called “revenue sharing,” are made by a fund or a fund's distributor, investment adviser or other related entity, based on average assets invested in the mutual fund. The specific fees received for the major product lines are described below.

“Rule 12b-1 fees” refers to Rule 12b-1 of The Investment Company Act of 1940, which allows a mutual fund to pay fees to broker-dealers for fund distribution, marketing and service support. These fees normally range from zero to 0.35%, depending on the class of shares and the fund. In addition, funds may also pay finder's fees of up to 1% for large purchases made within a specific time period. We may also receive payments from fund families for exhibitor booths at meetings and to assist with education of VALIC financial advisors.

Recordkeeping fees are paid by fund families for administrative services, such as individual participant accounting, customer service, printing and mailing account confirmations and statements, tax reporting, and all regulatory mailings. The recordkeeping fees are paid on a per participant basis or a set percentage and usually range from zero to 0.50% or up to \$12 per participant. Funds may choose to pay higher recordkeeping fees instead of 12b-1 fees.

VALIC's Fixed and Variable Annuity, Portfolio Director®: VALIC receives an annual 12b-1 fee from the Ariel and Ariel Appreciation Funds of 0.25%, calculated as a percentage of the total amount invested in each fund. Additionally, we receive sub-transfer agent recordkeeping fees from SunAmerica High Watermark Funds, Ariel and Ariel Appreciation Funds and the Lou Holland Growth Fund. VALIC uses the fees received to reduce the separate account charges for each contract owner and plan participant. The separate account charge will not increase even if the revenue sharing is no longer received.

Group Mutual Fund Product: VALIC develops a plan administrative fee for the services provided to each retirement plan. The plan sponsor receives a list of all mutual funds available for a retirement plan and may choose the mutual funds for the retirement plan based on factors such as investment objectives, historical performance, fund expenses, and the 12b-1 and recordkeeping fees paid to VALIC. Generally, the plan administrative fee minus the expected revenue sharing (based upon assumed plan-level investment allocations) equals the “Adjusted Fee” to be paid by each participant, as shown in the simplified example below. The actual amount of revenue received will depend on the assets invested in each mutual fund. The plan administrative fees are reduced by the expected amount of revenue received, shown as a percentage in the equation below. Thus, all plan participants directly benefit from VALIC's receipt of “revenue sharing.”

### Group Mutual Fund Platform

Administrative Fee (for recordkeeping and other retirement plan administrative services) . . . . .	0.42%
Expected Revenue Sharing Payment (based on assets invested in each fund) . . . . .	(0.27%)
Adjusted Fee to be paid by each participant (a portion of the Adjusted Fee may be returned to the plan sponsor for the payment of plan-related administrative expenses) . . . . .	0.15%

*To obtain a prospectus, visit [www.valic.com](http://www.valic.com). You may also call 1-800-448-2542 for all annuity contract and underlying fund prospectuses, or for mutual fund prospectuses. The prospectus contains the investment objectives, risks, charges, expenses and other information about the respective investment company that you should consider carefully before investing. Please read the prospectus carefully before investing or sending money.*

**Securities and investment advisory services are offered by VALIC Financial Advisors, Inc., member FINRA, SIPC and SEC-registered investment advisor.**

VALIC represents The Variable Annuity Life Insurance Company and its subsidiaries VALIC Financial Advisors, Inc. and VALIC Retirement Services Company.