Annual Participant Fee Disclosure
For Currently Available Investment Options

DUKE UNIVERSITY
THE DUKE UNIVERSITY FACULTY AND STAFF RETIREMENT PLAN

This disclosure contains important information about the investment options offered in THE DUKE UNIVERSITY FACULTY AND STAFF RETIREMENT PLAN ("Plan"). Federal regulations require that you receive this information. More importantly, this information can assist you in making critical decisions regarding your retirement plan including how much to contribute and how to invest your account — decisions which are key to the success of your retirement savings.

Please review these materials carefully. Although no action is required at this time, please keep this information available when managing or monitoring any account you may have in the Plan.

What's Inside

Section I: Understanding the Basics
Learn more about factors to consider when making investment decisions.

Section II: Investment Alternatives Comparative Chart
Review information about the investment options under the Plan, including historical or stated rates of return, fees and expenses and restrictions.

Section III: Individual Fees and Charges
Review the types of individual fees and charges that may be deducted from your account.

Section IV: Plan Information and Administrative Expenses
Review giving investment instructions, including limitations, and voting rights, along with plan administrative fees and charges.

Section V: Footnotes and Definitions
Review important footnotes and definitions for the information contained throughout this disclosure.

Section VI: Summary of Resources
Review additional resources that will assist with understanding the information contained in this disclosure.

Plan Administrator
DUKE UNIVERSITY, 705 BROAD ST, DURHAM, NC 27708, 919-684-5600

Throughout this disclosure, VALIC represents The Variable Annuity Life Insurance Company and its subsidiaries VALIC Financial Advisors, Inc. and VALIC Retirement Services Company.
Section I: Understanding the Basics

Retirement plan experts and the United States Department of Labor have noted that fees and expenses are an important consideration for plan participants, along with investment performance, available services, guarantees and investment features. In short, what are you paying, and what are you getting for it?

Fees and expenses can be associated with the general administration of a retirement plan, a particular individual service you elect or incorporated into the investment options you choose. This disclosure describes your plan’s services and available investment options and the fees associated with both.

> Administrative services
   General administrative services can include recordkeeping, legal and accounting services, customer service and communications including quarterly account statements.

> Individual services
   Individual services include any service that is available in the plan that you elect to use. An example of an individual service would be a loan, which may include an initial set-up fee as well as an annual loan maintenance fee.

> Investment options
   Investment options may have fees and expenses associated with that particular option. For example:

   • Operating expenses
     Investment funds and products may charge fees to cover the fund’s total annual operating expenses. Also known as an expense ratio, these fees are generally not deducted from your account; rather they are calculated in the share price or net asset value of the investment option. So, the performance data shown on any fund already takes these fees into account. Since the expense ratio varies by fund and is not directly deducted from your account, it will be important for you to understand the fees for any fund. Expense ratios are noted in this disclosure as both a percent and a dollar amount per $1,000. So, if the expense ratio is 0.50%, the actual fund expense is $5.00 for each $1,000 you have in that fund. These fees also may include annuity contract charges, such as separate account fees which are in consideration of certain additional guarantees, including death benefit guarantees as well as lifetime guaranteed payment options. Expense ratios can have a significant effect on your investment returns. That's why you should be aware of them as you select investment options. For instance, in the hypothetical example below, we can look at two identical investments with identical rates of return before expenses are charged to the fund. In this example, these two investments have different expense ratios—0.50% (as mentioned above) and 1.50%. You can see the difference in the cumulative return over 20 years:

<table>
<thead>
<tr>
<th></th>
<th>Investment One</th>
<th>Investment Two</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investment</td>
<td>$20,000</td>
<td>$20,000</td>
</tr>
<tr>
<td>Gross annual return</td>
<td>8%</td>
<td>8%</td>
</tr>
<tr>
<td>Annual expense ratio</td>
<td>0.50%</td>
<td>1.50%</td>
</tr>
<tr>
<td>Total investment balance after 20 years</td>
<td>$84,957</td>
<td>$70,473</td>
</tr>
</tbody>
</table>

   This illustration is only an example and does not represent the return of any actual investment.

   • Trading fees
     Some funds impose trading restrictions or charge transaction fees related to trading frequency. Such transaction fees, including short-term trading fees, may be deducted from your account when applicable.

   • Fixed investment fees
     Fixed investment options can include fees or transfer and withdrawal restrictions in return for a guaranteed return on investment.

These fees are an important part of the story, but not the entire story. Fees should not be reviewed in a vacuum. It is important to understand the fees you are paying in the context of what you are getting for those fees. That includes the services, options and guarantees that those fees provide. It is also important to consider the investment option performance, which, as noted above, has already taken into account some or all of the fees. Performance data included in this disclosure provides the same general information across investment options so you can compare them.

Some explanations that may help clarify how to view the information are:
> **Fund Performance** for each fund as of the same time period — allowing you to compare "apples to apples" with the same market conditions.

> **Categorization** of funds are classified by category or asset class — allowing you to compare one fund to a similar fund, such as bond funds to bond funds.

> **Annual operating expenses** are shown as a percent or a dollar amount per $1,000 of investment — allowing you to compare expenses across funds.

> **Benchmark information** is provided for each fund — allowing you to compare a fund you are considering against the benchmark the fund company has identified.

> **Shareholder-type fees and restrictions** are also identified — allowing you to compare and determine if it will meet your individual goals.

It is important to remember that past performance is not an indicator or guarantee of future results and that higher or lower fees are not necessarily indicative of the performance of that fund. To remain informed, you may want to take advantage of more current performance data which is available online for each fund at [www.valic.com/feeadisclosure](http://www.valic.com/feeadisclosure).

> **Annuity options**

Two factors to consider when reviewing your annuity options available under the Plan include:

- **Guaranteed Death Benefit**

  Annuities provide specific guarantees of payment to your designated beneficiary if your death occurs prior to annuitization or contract surrender.

- **Guaranteed Income Payment Options**

  Annuities are insurance contracts that allow you to receive a guaranteed stream of payments at regular intervals, usually beginning when you retire and may last for your entire life, in return for an investment. You may choose to have your account paid out in a fixed, variable, or combination of methods including lifetime annuity, lump sum, installment and partial annuity options.

The information provided in this disclosure supplements the information already provided to participants in the Plan's Summary Plan Description (SPD), Summary Annual Report (SAR) and quarterly benefit statements. This disclosure does not replace or alter the terms of the Plan or investment arrangements. This disclosure is subject to the terms of the Plan and investment arrangements and, in the event of a conflict, the terms of the Plan and/or investment arrangement will prevail.

Please keep in mind that investing involves risk including the possible loss of principal. Retirement accounts are long-term investments. Income taxes are payable upon withdrawal, and federal restrictions and a 10% federal penalty tax may apply to withdrawals prior to age 59½.

We hope that this disclosure will be helpful to you as you continue to plan for your retirement needs.

### Section II: Investment Alternatives Comparative Chart

The **Investment Alternatives Comparative Chart** provides important information to help you compare the investment options provided by VALIC under the Plan. These investments are administered by VALIC as the service provider. The Investment Alternatives Comparative Chart includes the following information:

> **Performance information** for the investment options provided by VALIC under the Plan. This includes investments that have a fixed or stated rate of return as well as investments with a variable rate of return.

> Shows how these investments have performed over time and allows you to compare them with an appropriate benchmark index for the same time periods. *Current performance may be higher or lower than the performance stated due to recent stock market volatility. The performance data quoted represents past performance. Past performance does not guarantee future results. The investment return and principal value of an investment will fluctuate so that investments, when withdrawn, may be worth more or less than the original cost.*

> **Shows fee and expense information** for the investment options provided by VALIC under the Plan.

  - Total annual operating expenses, which include the separate account fee, reduce the rate of return of the
investment option.
• The shareholder-type fees are in addition to the total annual operating expenses.
• Describes limitations or restrictions imposed by VALIC or the investment option.

> Presents the features of the annuity options available under the Plan.
• Annuities are insurance contracts that allow you to receive a guaranteed stream of payments at regular intervals, usually beginning when you retire and may last for your entire life, in return for an investment.
• These annuities are issued by The Variable Annuity Life Insurance Company and distributed by its affiliate, AIG Capital Services, Inc., member FINRA.
• All guarantees are backed by the claims-paying ability of The Variable Annuity Life Insurance Company.

Please visit https://my.valic.com/MyVALIC/FundPerformance/FundFactSheet.aspx?q=1 for a glossary of investment terms relevant to the investment options under this Plan. This glossary is intended to help you better understand your options.

Investment Option(s)

Below you will find detailed charts with information for each investment option concerning performance, fees, expenses and the features of the annuity options available under the Plan, if applicable.

More information can be found at: www.valic.com/feedisclosure
GROUP MUTUAL FUND W/ FIXED ANNUITY (M016) (Policy Form GFA-504, a fixed annuity issued by The Variable Annuity Life Insurance Company, Houston, Texas). The Plan's mutual fund options and the fixed annuity are available for investment by Participants. Transfers by the Participant (and, if applicable, by the Plan Sponsor) into and out of the fixed option(s) (and, if applicable, including certain withdrawals and surrenders) may be limited as described in the contract.

This product is generally available to Participants and eligible employees. Subject to the Plan, certain restrictions may apply. Example: the product may be available only for certain types of contributions.

An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation (FDIC) or any other government agency. While the fund seeks to preserve the value of a plan participant's investment at $1 per share, it is possible to lose money while investing in the fund.

### Variable Return Investments

<table>
<thead>
<tr>
<th>INVESTMENT NAME</th>
<th>Benchmark</th>
<th>Ticker</th>
<th>Asset Class</th>
<th>1 yr</th>
<th>5 yr</th>
<th>10 yr/Inception*</th>
<th>Benchmark as of 12/31/2013</th>
<th>Total Annual Operating Expenses</th>
<th>Shareholder-Type Fees/Restrictions</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMER FUNDS EUROPAC R4</td>
<td>MSCI ACWI Ex USA GR USD</td>
<td>REREX</td>
<td>Foreign Large Blend</td>
<td>20.17%</td>
<td>13.50%</td>
<td>8.91%</td>
<td>15.78%</td>
<td>13.32%</td>
<td>8.04%</td>
</tr>
<tr>
<td>AMERICAN CEN INFL-ADJ BOND INS</td>
<td>Barclays US Treasury US TIPS TR USD</td>
<td>AIANX</td>
<td>Inflation-Protected Bond</td>
<td>-8.94%</td>
<td>5.25%</td>
<td>4.71%</td>
<td>-8.61%</td>
<td>5.63%</td>
<td>4.85%</td>
</tr>
<tr>
<td>DREYFUS BOND MARKET INDEX</td>
<td>Barclays US Agg Bond TR USD</td>
<td>DBIRX</td>
<td>Intermediate-Term Bond</td>
<td>-2.35%</td>
<td>4.00%</td>
<td>4.33%</td>
<td>-2.02%</td>
<td>4.44%</td>
<td>4.55%</td>
</tr>
<tr>
<td>PIMCO TOTAL RET INSTL</td>
<td>Barclays US Agg Bond TR USD</td>
<td>PTTRX</td>
<td>Intermediate-Term Bond</td>
<td>-1.92%</td>
<td>6.91%</td>
<td>6.03%</td>
<td>-2.02%</td>
<td>4.44%</td>
<td>4.55%</td>
</tr>
<tr>
<td>VANGUARD 500 INDEX SIGNAL</td>
<td>S&amp;P 500 TR USD</td>
<td>VIFSX</td>
<td>Large Blend</td>
<td>32.33%</td>
<td>17.94%</td>
<td>6.86%</td>
<td>32.39%</td>
<td>17.94%</td>
<td>6.86%</td>
</tr>
<tr>
<td>AMER FUNDS AMCAP R4</td>
<td>S&amp;P 500 TR USD</td>
<td>RAFEX</td>
<td>Large Growth</td>
<td>36.84%</td>
<td>20.32%</td>
<td>7.95%</td>
<td>32.39%</td>
<td>17.94%</td>
<td>7.41%</td>
</tr>
<tr>
<td>RIDGEWORTH FDS LARGE CAP VAL</td>
<td>Russell 1000 Value TR USD</td>
<td>STVTX</td>
<td>Large Value</td>
<td>34.19%</td>
<td>17.80%</td>
<td>8.82%</td>
<td>32.53%</td>
<td>16.67%</td>
<td>7.58%</td>
</tr>
<tr>
<td>VANGUARD MID CAP INDEX SIGNAL</td>
<td>CRSP US Mid Cap TR USD</td>
<td>VMISX</td>
<td>Mid-Cap Blend</td>
<td>35.15%</td>
<td>22.07%</td>
<td>7.22%</td>
<td>35.27%</td>
<td>21.77%</td>
<td>6.26%</td>
</tr>
<tr>
<td>AMERICAN CEN MID CAP VALUE INS</td>
<td>Russell Mid Cap Value TR USD</td>
<td>AVUAX</td>
<td>Mid-Cap Value</td>
<td>30.26%</td>
<td>18.78%</td>
<td>11.15%</td>
<td>33.46%</td>
<td>21.16%</td>
<td>7.83%</td>
</tr>
<tr>
<td>COLUMBIA BALANCED Z</td>
<td>S&amp;P 500 TR USD</td>
<td>CBALX</td>
<td>Moderate Allocation</td>
<td>21.30%</td>
<td>15.22%</td>
<td>7.90%</td>
<td>32.39%</td>
<td>17.94%</td>
<td>7.41%</td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT INC</td>
<td>S&amp;P Target Date Retirement Income TR USD</td>
<td>TRRIX</td>
<td>Retirement Income</td>
<td>9.15%</td>
<td>10.37%</td>
<td>5.82%</td>
<td>6.28%</td>
<td>7.62%</td>
<td>4.85%</td>
</tr>
<tr>
<td>DREYFUS SM CAP STK INDX</td>
<td>S&amp;P SmallCap 600 TR USD</td>
<td>DISSX</td>
<td>Small Blend</td>
<td>40.76%</td>
<td>21.04%</td>
<td>10.40%</td>
<td>41.31%</td>
<td>21.37%</td>
<td>10.65%</td>
</tr>
<tr>
<td>INVESTMENT NAME Benchmark</td>
<td>Ticker</td>
<td>Asset Class</td>
<td>1 yr</td>
<td>5 yr</td>
<td>10 yr/Inception*</td>
<td>As a %</td>
<td>Per $1000</td>
<td>Shareholder-Type Fees/Restrictions</td>
<td></td>
</tr>
<tr>
<td>---------------------------</td>
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<td>----------------------------------</td>
<td></td>
</tr>
<tr>
<td>JANUS TRITON T Russell 2500 Growth TR USD</td>
<td>JATTX</td>
<td>Small Growth</td>
<td>36.28%</td>
<td>26.27%</td>
<td>13.87% 02/25/05</td>
<td>40.65%</td>
<td>24.03%</td>
<td>7.12% 02/25/05</td>
<td></td>
</tr>
<tr>
<td>HEARTLAND VALUE PLUS INSTL Russell 2000 Value TR USD</td>
<td>HNVIX</td>
<td>Small Value</td>
<td>34.54%</td>
<td>18.42%</td>
<td>10.70% 05/01/08</td>
<td>34.52%</td>
<td>17.64%</td>
<td>7.27% 05/01/08</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2010 S&amp;P Target Date 2010 TR USD</td>
<td>TRRAX</td>
<td>Target Date 2000-2010</td>
<td>11.93%</td>
<td>12.78%</td>
<td>6.63%</td>
<td>9.42%</td>
<td>9.16%</td>
<td>5.47%</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2015 S&amp;P Target Date 2015 TR USD</td>
<td>TRRGX</td>
<td>Target Date 2011-2015</td>
<td>15.18%</td>
<td>14.32%</td>
<td>6.85% 02/27/04</td>
<td>12.16%</td>
<td>10.54%</td>
<td>6.99% 02/27/04</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2020 S&amp;P Target Date 2020 TR USD</td>
<td>TRRBX</td>
<td>Target Date 2016-2020</td>
<td>18.05%</td>
<td>15.61%</td>
<td>7.35%</td>
<td>14.76%</td>
<td>11.75%</td>
<td>6.26%</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2025 S&amp;P Target Date 2025 TR USD</td>
<td>TRRHX</td>
<td>Target Date 2021-2025</td>
<td>20.78%</td>
<td>16.63%</td>
<td>7.39% 02/27/04</td>
<td>17.03%</td>
<td>12.77%</td>
<td>6.99% 02/27/04</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2030 S&amp;P Target Date 2030 TR USD</td>
<td>TRRCX</td>
<td>Target Date 2026-2030</td>
<td>23.09%</td>
<td>17.50%</td>
<td>7.87%</td>
<td>19.14%</td>
<td>13.60%</td>
<td>6.73%</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2035 S&amp;P Target Date 2035 TR USD</td>
<td>TRRJX</td>
<td>Target Date 2031-2035</td>
<td>24.86%</td>
<td>18.06%</td>
<td>7.69% 02/27/04</td>
<td>20.84%</td>
<td>14.27%</td>
<td>6.99% 02/27/04</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2040 S&amp;P Target Date 2040 TR USD</td>
<td>TRRDX</td>
<td>Target Date 2036-2040</td>
<td>25.93%</td>
<td>18.28%</td>
<td>8.04%</td>
<td>22.10%</td>
<td>14.77%</td>
<td>6.96%</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2045 S&amp;P Target Date 2045 TR USD</td>
<td>TRRKX</td>
<td>Target Date 2041-2045</td>
<td>25.93%</td>
<td>18.29%</td>
<td>7.94% 05/31/05</td>
<td>23.14%</td>
<td>15.09%</td>
<td>7.04% 05/31/05</td>
<td></td>
</tr>
<tr>
<td>T. ROWE PRICE RTMT 2050 S&amp;P Target Date 2050+ TR USD</td>
<td>TRRMX</td>
<td>Target Date 2046-2050</td>
<td>25.90%</td>
<td>18.26%</td>
<td>6.08% 12/29/06</td>
<td>24.13%</td>
<td>15.27%</td>
<td>5.85% 12/29/06</td>
<td></td>
</tr>
<tr>
<td>T ROWE PRICE RTMT 2055 S&amp;P Target Date 2055+ TR USD</td>
<td>TRRNX</td>
<td>Target Date 2051+</td>
<td>25.86%</td>
<td>18.27%</td>
<td>6.07% 12/29/06</td>
<td>24.96%</td>
<td>15.49%</td>
<td>5.85% 12/29/06</td>
<td></td>
</tr>
</tbody>
</table>
Fixed Return Investments

<table>
<thead>
<tr>
<th>INVESTMENT NAME</th>
<th>Declared Rate</th>
<th>As of Date</th>
<th>Total Annual Operating Expenses</th>
<th>Restrictions</th>
</tr>
</thead>
<tbody>
<tr>
<td>FIXED INTEREST OPTION</td>
<td>2.25%</td>
<td>12/31/2013</td>
<td>N/A</td>
<td>B</td>
</tr>
</tbody>
</table>

The guaranteed death benefit payable to your designated beneficiary for your annuity option includes the following:

<table>
<thead>
<tr>
<th>Objective/Goals</th>
<th>Pricing Factors</th>
<th>Restrictions/Fees</th>
</tr>
</thead>
<tbody>
<tr>
<td>The contract provides specific guarantees of payment to your designated</td>
<td>The death benefits are automatically included in the annuity contract for no</td>
<td>The death benefit provisions may vary from state to state.</td>
</tr>
<tr>
<td>beneficiary if your death occurs prior to annuitization or contract surrender.</td>
<td>additional fee.</td>
<td></td>
</tr>
<tr>
<td>The guarantees generally apply to the original deposit(s) reduced (in the</td>
<td></td>
<td></td>
</tr>
<tr>
<td>manner described in the contract and any applicable endorsement) by prior</td>
<td></td>
<td></td>
</tr>
<tr>
<td>withdrawals. This can be an important guarantee for many participants, and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>you should refer to the contract or certificate for specific details as to the</td>
<td></td>
<td></td>
</tr>
<tr>
<td>application and calculation of the guarantee.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The death benefits are automatically included in the annuity contract for no</td>
<td></td>
<td></td>
</tr>
<tr>
<td>additional fee.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The death benefit provisions may vary from state to state.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The various forms of guaranteed income payment options available for your annuity option are as follows:

<table>
<thead>
<tr>
<th>Objective/Goals</th>
<th>Pricing Factors</th>
<th>Restrictions/Fees</th>
</tr>
</thead>
<tbody>
<tr>
<td>When you are ready to begin taking income, you can choose to receive</td>
<td>The cost of each option depends on your age, the interest rates and mortality</td>
<td>Once your payments have begun, the option you chose cannot be stopped or changed.</td>
</tr>
<tr>
<td>income payments on a variable basis, fixed basis, or a combination.</td>
<td>table when you buy it, and the interest rates and mortality table guaranteed in</td>
<td>The first payment must be at least $25 and the total annual payment must be</td>
</tr>
<tr>
<td>You may specify the manner in which your income payments are made. You may</td>
<td>your contract.</td>
<td>at least $100. VALIC reserves the right to reduce the frequency of payments so</td>
</tr>
<tr>
<td>select one of the following options:</td>
<td></td>
<td>each payment is at least $25.</td>
</tr>
<tr>
<td>• Life Only: Provides a guaranteed stream of income for your life. Under this option there is no provision for a death benefit for the beneficiary.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Life Option with Guaranteed Period: Provides a guaranteed stream of income</td>
<td></td>
<td></td>
</tr>
<tr>
<td>for your life. If you die before the guaranteed period has expired, your</td>
<td></td>
<td></td>
</tr>
<tr>
<td>beneficiary can receive payments for the rest of the guaranteed period, or take a lump-sum distribution.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Life with Cash or Unit Refund: Provides a guaranteed stream of income for</td>
<td></td>
<td></td>
</tr>
<tr>
<td>your life. These payments are based upon your life expectancy and will</td>
<td></td>
<td></td>
</tr>
<tr>
<td>continue for as long as you live. If you do not outlive the life expectancy,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>your beneficiary may receive an additional payment.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Joint and Survivor Life: Provides a guaranteed payment stream of income</td>
<td></td>
<td></td>
</tr>
<tr>
<td>during the joint lifetime of you and a second person. Upon the death of one,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>payments continue during the lifetime of the survivor. There is no death</td>
<td></td>
<td></td>
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<td>benefit at the death of the last survivor.</td>
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<td>• Payments for a Designated Period: Provides a guaranteed payment stream of</td>
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<td>income to you for a select number of years between 5 and 30. Upon your death,</td>
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<td>payments will continue to your beneficiary until the designated period is</td>
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<td>completed.</td>
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Section III: Individual Fees and Charges

An explanation of expenses deducted from your account on an individual, rather than Plan-wide, basis, such as fees for processing loans, is provided below.

In addition to the individual expenses described below, certain types of charges that may be deducted from your account related to the buying and selling of investments (e.g., redemption fees) are described in Section II, the annuity contracts/certificates and/or in the investment option’s prospectus.

Withdrawals and Surrenders

Withdrawal or surrender charges, if any, are described in Section II.

Loans

Each loan from a mutual fund account is assessed:
- A one-time $50 loan processing fee.
- A $50 annual maintenance fee, which is deducted on a quarterly basis and processed pro-rata against all investment options in your account.

Section IV: Plan Information and Administrative Expenses

Operation of the Plan

Information regarding investment instructions, including limitations, and voting rights is provided below.

Giving Investment Instructions

In order to direct your Plan investment with VALIC, and subject to any Plan and investment restrictions described below, you may make your election on VALIC’s website, www.valic.com, or you may contact VALIC at 800-448-2542.

For security reasons, you will be asked to verify your identity by logging into your account on VALIC.com. Should you need to register for VALIC.com, please visit https://login.valic.com/sso/ and click on “Register for individual access” under “Need to register for online access?” in the middle of the screen.

You may give your instructions on any day. Instructions include updates to the investment allocations on your account(s) and transfers of assets between the available investments offered by the Plan. Instructions completed by close of the New York Stock Exchange (NYSE) (Eastern Time) will be effective that day. Instructions completed after the close of the NYSE (Eastern Time) will be effective on the next business day.

Plan Limitations on Instructions

You may transfer vested balances between any of the approved Investment Carriers. Unvested balances may only be transferred within 30 days of the first employer contribution.

Designated Investment Alternatives

See Section II for a list of all investment options provided under the Plan by VALIC.

Designated Investment Manager

There is no Designated Investment Manager for the Plan.

Voting and Other Rights

Duke passes proxy voting rights to participants for the investments in the participant accounts.
Plan Fees and Expenses

An explanation of fees and expenses for general Plan administrative services (e.g., legal, accounting and recordkeeping) that may be deducted from a participant's account and the basis on which such charges will be allocated is provided below.

An annual administrative fee of 0 basis points is charged to Participant accounts or paid by the Plan Sponsor quarterly. This fee is less than the total cost of the services, which is 39 basis points, because it has been offset by the anticipated Indirect Compensation received by VRSCO and affiliates. This fee will not be increased or decreased based upon actual Indirect Compensation received. It may be revised if there are changes in the investment options. VRSCO will pay an annual revenue sharing amount not to exceed $80,000 to the Plan Sponsor for Plan administration expenses.

The Plan may incur charges or fees outside of the investment alternative product(s) that may be deducted from participant accounts as directed or authorized by the Plan Administrator. These fees may include third-party administration, consultant, legal, audit, and other fees directly related to the operation of the Plan. Any such charges or fees deducted from VALIC participant accounts will be reflected on quarterly participant account statements.

Section V: Footnotes and Definitions

* 10 yr/Inception: The data in this column is based on the lesser of 10 years or the inception date of the fund.

** 10 yr/Inclusion: The data in this column is based on the lesser of 10 years or the date the funds were included in the annuity product.

N/A = Not applicable and/or none.

$ = Investment option has not been in existence for a long enough period of time and data is not available.

‡ = No data available at the time this disclosure was prepared.

Asset classes, and the indexes from which their historical returns are derived, are not managed funds, have no identifiable objectives and cannot be purchased. They do not provide an indicator of how individual investments performed in the past or how they will perform in the future. Performance of indexes does not reflect the deduction of any fees and charges, and past performance of asset classes does not guarantee the future performance of any investment.

These disclosures reflect benchmarks as identified in fund prospectuses where available and may include multiple benchmarks as indicated. Otherwise benchmarks are provided by Morningstar. Performance data for investment options (other than investment options under VALIC annuity products) and benchmarks (where available) were supplied by Morningstar. ©2011 Morningstar, Inc. All Rights Reserved. This information: (1) is proprietary to Morningstar and/or its content providers; (2) may not be copied or distributed; and (3) is not warranted to be accurate, complete or timely. Neither VALIC nor Morningstar, nor Morningstar's content providers, are responsible for any damages or losses arising from any use of the data contained herein.

If you want additional information about the investment options, you can go to www.valic.com/feedisclosure. Information on the website includes the option's objectives and goals, principal risks and principal strategies, portfolio turnover rate, performance data and fee and expense information. A free paper copy of the information on the website may be obtained by contacting the Plan Administrator. Contact information is located in on the first page of this disclosure. Additional information may also be obtained at www.valic.com/feedisclosure.

VALIC has an Investor Trading Policy to discourage excessive trading and market timing as such activity can result in increased fund expenses. If an investor sells fund shares in the Plan valued at $5,000 or more, the investor will not be able to make a purchase of $5,000 or more in that same fund for 30 calendar days. Certain transactions may be excluded from this policy. The Investor Trading Policy for VALIC can be located at https://www.valic.com/investor-trading-policy_3240_423144.html or you may contact VALIC at 800-448-2542.

When you are reviewing the fee and expense information, please keep in mind that the cumulative effect of fees and expenses can substantially reduce the growth of your retirement savings. Visit the Department of Labor's website for an example showing the long-term effects of fees and expenses at http://www.dol.gov/ebsa/publications/401k_employee.html. Fees and expenses are only one of many factors to consider when you decide to invest in an option. You may also want to think about whether an investment in a particular option, along with your other investments, will help you achieve your financial goals.

Average Annual Total Return: Reflects the average annual compounded rate of return which would equate an initial investment of $10,000 in a designated investment alternative to the ending redeemable value, assuming application of the maximum amount of applicable charges. The calculations assume that the investment was made at the beginning of the period and fully withdrawn at the end of the period (whether or not such a withdrawal would have been permitted under the plan). The returns displayed for the benchmarks are reduced only for the fees included in the benchmark itself, if any, and not the product-specific fees. Average Annual Total Return for any investment other than a benchmark reflects all applicable fees for the investment option and thus also is the
same as the Standard Average Annual Total Return for such investment.

**Shareholder-Type Fees/Restrictions (in addition to the VALIC Investor Trading Policy):**

1. **Transfer Restriction** (Dollar Limitation): Transfers from this fund in excess of $5000 will restrict transfers into this fund for a period of 30 days.

**Fixed Return Investment Restrictions**

B Not less frequently than annually, VALIC will declare interest rates that apply either to the entire accumulation value, or separately to amounts accumulated in separate time periods. The interest rate will be set in advance of the period to which it relates and will never fall below 1%. In-service withdrawals of up to 20% per contract year are allowed. Waivers may apply. Please refer to your contract or certificate for specific guarantee.

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### Section VI: Summary of Resources

**Glossary of Investment Terms**
https://my.valic.com/MyVALIC/FundPerformance/FundFactSheet.aspx?g=1

**Prospectuses for VALIC Annuity Products**
https://www.valic.com/prospectuses-reports_3240_424368.html

**Updated Investment Performance Data and Fund Fact Sheets**
www.valic.com/feedisclosure

**Link to Informational Audio/Video Presentation**
www.valic.com/participant_fee_disclosure

Retirement plans and accounts that satisfy relevant qualification rules, such as 403(b)s, IRAs, 401(k)s, etc., can be tax deferred regardless of whether or not they are funded with an annuity. If you are considering funding a tax-qualified retirement plan or account with an annuity, you should know that an annuity does not provide any additional tax-deferred treatment of earnings beyond the tax deferral of the tax-qualified retirement plan or account itself. However, annuities do provide other features and benefits.

Generally, higher potential returns involve greater risk and short-term volatility. For example, small-cap, mid-cap, sector and emerging funds experience significant price fluctuation due to business risks and adverse political developments. International (global) and foreign funds can experience price fluctuation due to changing market conditions, currency values, and economic and political climates. High-yield bond funds, which invest in bonds that have lower ratings, typically experience price fluctuation and a greater risk of loss of principal and income than when investing directly in U.S. government securities such as U.S. Treasury bonds and bills, which are guaranteed by the government for repayment of principal and interest if held to maturity. Mortgage-related funds' underlying mortgages are more likely to be prepaid during periods of declining interest rates, which could hurt the fund's share price or yield and may be prepaid more slowly during periods of rapidly rising interest rates, which might lengthen the fund's expected maturity. Investors should carefully assess the risks associated with an investment in the fund. Fund shares are not insured and are not backed by the U.S. government, and their value and yield will vary with market conditions.

To obtain a prospectus, visit https://www.valic.com/prospectuses-reports_3240_424368.html. You can also call 1-800-428-2542 and follow the prompts to request all annuity prospectuses. Underlying fund prospectuses and mutual fund prospectuses can be obtained through the ePrint function under Links to Login on www.valic.com. The prospectuses contain the investment objectives, risks, charges, expenses and other information about the respective investment companies that you should consider carefully before investing. Please read the prospectuses carefully before investing or sending money.

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

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

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