

**“REVENUE SHARING” PROGRAM POLICY  
AMOUNTS RECEIVED FROM FUND FAMILIES**

---

AIG Retirement 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 AIG Retirement 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 AIG Retirement 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 AIG 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: AIG Retirement 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 AIG Retirement. 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 AIG Retirement’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)	<u>(0.27%)</u>
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.aigretirement.com](http://www.aigretirement.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 AIG Retirement Advisors, Inc., member FINRA, SIPC and SEC-registered investment advisor.**

AIG Retirement is the marketing name for the group of companies comprising AIG Retirement Advisors, Inc.; AIG Retirement Services Company; and The Variable Annuity Life Insurance Company (VALIC), each of which is a subsidiary of American International Group, Inc.