

**Portfolio Management Program (“PMP”)
Disclosure Statement – Schedule H
For
OneAmerica Securities, Inc.**

**433 North Capitol Ave.
INDIANANPOLIS, IN 46204
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This brochure provides clients with information about OneAmerica Securities, Inc. and the Portfolio Management Platform, a separately managed account program, which should be considered before becoming a client of the Portfolio Management Platform. This information has not been approved or verified by any governmental authority.

In addition to the PMP Program, OneAmerica Securities, Inc. also offers the Portfolio Choice by OneAmerica Program. For more information about this program please ask your Advisor Representative for the program’s brochure.

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I. SERVICE AND FEE SCHEDULE

OneAmerica Securities, Inc., (hereafter referred to as "OAS" or the "Company") intends to offer the Portfolio Management Platform ("PMP") to assist clients, both individuals and institutions (such as small businesses, pensions, trusts, charitable organizations, and others), to clarify their investment needs and to obtain professional asset management on a non-discretionary basis for a convenient single "wrap fee". The PMP Program is designed to provide clients with professional investment management by qualified adviser representatives that manage clients' investments in stocks, bonds, Exchange Traded Funds ("ETFs"), mutual funds, and other securities in accordance with client investment objectives. Professionals review and discuss with each client the level of diversification desired within the account, review with the client his/her asset allocation objectives, rebalance the portfolio as directed by the client, and provide reports to the client on the performance of the account.

The PMP Program includes an investor profile analysis. The OAS representative consults with the client to obtain detailed financial information and other pertinent data to enable the client to determine the appropriate investment guidelines, risk tolerance and other factors that will assist in ascertaining the suitability of the PMP Program. The adviser representative will consult with the client periodically to determine whether any data needs to be updated and whether any changes should be made to the client's investment guidelines, risk tolerance, or other factors pertaining to the continued suitability of the PMP Program for the client. Clients also are encouraged to contact OAS promptly to notify it of any changes to the information the client has provided or any other changes in the client's financial circumstances or investment goals. In addition, clients should feel free to contact OAS with any questions they have about the PMP Program.

The PMP Program invests client funds in listed and OTC equity and debt securities, ETFs, foreign issues, warrants, commercial paper, certificates of deposit, municipal securities, mutual funds, and government securities.

Fees for the PMP Program are broken down as follows:

Administrative Charge

\$50,000 to \$100,000 is billed at .23%
\$100,001 to \$500,000 is billed at .15%
\$500,001 to \$1,000,000 is billed at .10%
\$1,000,001 and over is billed at .04%

The administrative charge covers execution, clearance, and trade confirmation fees payable to Pershing, LLC.

Asset Based Charge

The total asset based fee charged for portfolio management will vary based on the account size and ranges from .50% to 2%. The adviser representative will be paid a portion of the asset-based fee charged as compensation for investment advice provided to the client.

The client will be charged one fee, a “Wrap Fee”, inclusive of the above charges as an annualized asset-based fee (“PMP Program Fee”) in accordance with the negotiated fee schedule as described above and within the client’s contract with OAS. The fee charged by OAS is based on a percentage of the total aggregate asset value of the account as of the previous quarter end date. The PMP fee will be payable quarterly in arrears. Payments are due and will be assessed on the last day of each calendar quarter based on the value of the account assets under management as of the close of the last business day of the preceding quarter valued by an independent pricing service, where available, or otherwise in good faith.

The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion thereof of an advisory client (Section 205(a)(1) of the Advisers Act).

All fees paid to OAS for investment advisory or services are separate and distinct from the fees and expenses charged by mutual funds and exchange-traded fund (ETFs) to their shareholders. These fees and expenses are described in each fund’s prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund or ETF directly, without the services of OAS. In that case, the client would not receive the services provided by OAS which are designed, among other things, to assist the client in determining which fund or funds are most appropriate to each client’s financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by OAS to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

The client agreement shall, be effective for the annual period commencing with the date of its execution, and will thereafter, on each anniversary date, be automatically extended for an additional one-year term unless either party notifies the other of intent to terminate the agreement. If the relationship between OAS and a client is terminated prior to the end of a calendar quarter, the fee is calculated on a pro rata basis. Any liquidations as result of a termination request may take up to two trading days to be effected and will be payable to the client within ten days of the liquidation notice. The investment advisory relationship between OAS and each of its clients may be terminated by either party upon written notice. A full refund will be provided should the agreement be terminated within 5 business days of the initial contract signing.

The client authorizes OAS to deduct all applicable fees from the client’s account held at an independent qualified custodian (Pershing, LLC). All such fees will be clearly noted

on client's statements. Upon client's request, OAS shall provide an accounting of the manner in which a particular fee has been calculated.

II. INVESTMENT STRATEGY

OAS offers investment advice through the PMP Program in the areas of listed and OTC equity and debt securities, ETFs, foreign issues, warrants, commercial paper, certificates of deposit, municipal securities, mutual funds, and government securities. Adviser representatives typically utilize a fundamental, technical, charting or cyclical method of securities analysis for long and short term investing. Representatives' main sources of information include financial newspapers and magazines, research material by others, corporate rating services, annual reports and prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Each client will sign an Investment Policy Statement (IPS), which will outline the parameters of the recommended strategy. The recommended strategy will be based on the client's investment objective (capital preservation, growth, etc.) and will consist of an appropriate investment strategy to achieve the desired results.

III. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Securities industry regulations require that advisory firms provide their clients with a general description of the advisory firm's Code of Ethics. The Company has adopted a Code of Ethics in compliance with 204A-1 in reference to the firm's controls over personal trading that sets forth the governing ethical standards and principles of the Company. It also describes the Company's policies regarding the protection of confidential information, training of personnel and recordkeeping. Additionally, the Code describes the firm's requirements for the review of the personal securities transactions and holding of certain personnel of the Company for evidence of manipulative trading, trading ahead of clients, insider trading and trading restrictions. A copy of the Company's Code of Ethics may be obtained by writing to the Company.

OAS or its related persons may buy or sell for themselves investment products or securities recommended to clients. Records will be maintained of all securities bought or sold by OAS, associated persons or related entities.

IV. COMPARISON COST OF SERVICE

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees. The PMP Program may cost clients more or less than purchasing such services separately depending on the frequency of trading in the client's accounts, commissions charged at other broker/dealers for similar products, and fees charged for like services by other broker/dealers. Generally,

accounts that trade frequently benefit more from the “wrap fee” than those accounts with less turnover since commission charges are included in the overall PMP Program Fee.

V. CONDITIONS FOR MANAGING ACCOUNTS

The minimum account size is \$50,000 per account unless the account is aggregated with other accounts of the same owner, with the same investment objective (which will allow multiple accounts to be managed as one portfolio). Otherwise, an OAS principal may approve a smaller opening balance.

VI. REVIEW OF ACCOUNTS

OAS conducts individual client reviews on clients’ accounts as needed. The investment adviser representative assigned to the account will do reviews. At least annually, meetings are requested in order to review account information and to verify all financial information and stated investment objectives are correct and up-to-date.

The timing and nature of account reviews are dictated by a variety of factors, including contributions or withdrawals of cash from an account; a substantial change in the market value of assets under management; a client’s request for tax-loss selling; a client’s request for information regarding the performance or structure of an account; the performance of an account; interest rate changes; changes in the list of securities approved for purchase for a particular objective; changes necessary to rebalance the portfolio to maintain client objectives and desired asset mix; and requirements imposed by court order or regulatory degree (if applicable).

The associated investment adviser representatives monitor PMP program client performance regularly. Accounts are reviewed to determine if the securities and positions are appropriate based upon individual client objectives.

OAS provides all introducing brokerage services and uses Pershing, LLC (“Pershing”) for clearing and settlement of all transactions. Generally, the securities are all liquid, listed securities with readily available market prices. If a price is not available or a security is deemed illiquid, Pershing will fair-value the security according to industry fair-value determination standards.

Clients are provided monthly brokerage statements when activity occurs and a quarterly portfolio valuation statement from Pershing, the account custodian, containing the cash balance; type, name and amount of each security; current dollar market value of each security; and current percentage of each security as a percent of the total current market value of the entire portfolio.

Clients with specific portfolio restrictions or limitations on their account may receive performance either higher or lower than those accounts with no restrictions or limitations.

VII. EDUCATION AND BUSINESS STANDARDS FOR PORTFOLIO MANAGERS

Before being considered to become an Investment Adviser Representative of OneAmerica Securities, the individual must first be a Registered Representative of OneAmerica Securities. An individual previously registered as an RIA or IAR who can demonstrate experience or expertise and meet the registration requirements in the state where the advisor conducts advisory business and/or has advisory clients may apply for affiliation with OneAmerica. Individuals new to the advisory business must first obtain a FINRA Uniform Investment Adviser Law Exam Series 65 or Uniform Combined State Law Exam Series 66 license or actively hold one of the following professional designations: Chartered Financial Analyst (CFA), Chartered Financial Consultant (ChFC), Chartered Investment Counselor (CIC), Personal Financial Specialist (PFS) or Certified Financial Planner (CFP).

VIII. INVESTMENT ADVISOR REPRESENTATIVES/OFFICERS

EDUCATION AND BUSINESS BACKGROUNDS

Nicholas A. Filing, CHFC

DOB: 1947

Education Background

University of Akron
Akron, OH

BA, Education

Business Background

OneAmerica Securities, Inc.
President

2004 - Present

Jay Williams

DOB: 1966

Education Background

Thomas M. Cooley Law School

Juris Doctorate

Business Background

OneAmerica Financial Partners, Inc.
Chief Compliance Officer

1993 – Present

Daniel Reichart

DOB: 1964

Education Background

Ball State University	MBA
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Business Background

OneAmerica Securities, Inc. Director of Advisory Services	2008 - Present
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TD Ameritrade, Inc. Investment Consultant	2006-2008
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Simons Company Sales	2005
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McDonald and Company Financial Advisor	2003-2005
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IX. CONFLICTS OF INTEREST

OAS is full service Broker/Dealer effectively registered with the Securities and Exchange Commission, a member of Financial Regulatory Authority (FINRA) and registered with various state regulatory agencies. In this capacity, OAS is involved in the sale of various types of securities, including, but not limited to, stocks, bonds and mutual funds. In their capacity with OAS, associated persons of the Company spend approximately 80% of their time selling securities and managing securities business and 20% of their time providing investment advice.

Associated persons that serve as registered representatives of OAS are compensated via the payment of 12b-1 fees for the sale of investment company products and other commissions from securities transactions recommended to clients of OAS. This may create a conflict of interest when providing investment advice to clients.

As a registered broker-dealer, OAS may effect securities transactions for advisory clients. The broker-dealer arm of OAS executes securities transactions effected for those clients participating in the PMP Program.

OAS is a wholly owned subsidiary of American United Life Insurance Company ("AUL"), an Indiana insurance company. AUL is also a registered investment adviser with the SEC. The primary activity of AUL is that of an insurer offering both fixed and variable life insurance products. Its investment adviser operations are focused on providing investments to employee benefit plans and variable products. OAS distributes all variable products issued by AUL. In addition, AUL participates in revenue sharing arrangements with the mutual fund families whose portfolios are offered in the proprietary variable products issued by AUL.

Consequently, OAS and AUL have an affiliation as members of the same consolidated group of corporations. Moreover, the two entities may share employees and employees

may have duties split between the insurance or investment adviser activities of AUL and the broker-dealer or advisory activities of OAS.

In addition to being a registered broker-dealer, OAS is also a licensed insurance agency with various states. Advisory clients may be offered fixed and variable insurance products as part of their advisory account, including equity-indexed annuities.

Associated persons of OAS may also be associated persons of the registered broker-dealer arm of OAS and career agents with the parent company, American United Life Insurance Company. The client is advised that OAS and the investment adviser representative may be receiving a fee for investment advice as well as commissions earned on securities transactions and/or insurance products, both fixed and variable. Some of these products may be issued by AUL; others will be issued by companies with which OAS has selling agreements.

If a client has not made another election, Pershing, LLC, as custodian under the PMP Program, has authority to sweep cash awaiting investment or reinvestment into one of its proprietary cash or money market funds. Clients will be charged the resulting management fees of the money market funds used for sweeping cash for these purposes. This may provide an incentive to Pershing, LLC to sweep cash into its proprietary funds.

All of the Company's senior management, with the exception of Daniel Reichart, spends a majority of their time (greater than 50%) on broker-dealer related activities. Mr. Reichart, as Director of Advisory Services, spends approximately 100% of his time managing the investment adviser operations.

X. ADDITIONAL DISCLOSURES

If the client chooses the PMP program, the client is directing OAS to serve as the broker-dealer for the account and the account will be held at the OAS clearing firm Pershing, LLC. Fees may be found at other broker/dealers which may be higher or lower than those charged at OAS. In client directed brokerage accounts it may not be possible for OAS to negotiate commissions or obtain best execution.