

O.N. INVESTMENT MANAGEMENT COMPANY

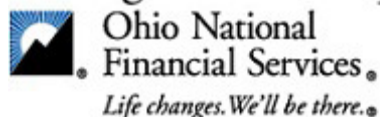
ONIMCO

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Cincinnati, Ohio 45242

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O.N. Investment
Management Company



Form ADV Part 2A – Firm Brochure

Version: 3/23/2012

This Brochure provides information about the qualifications and business practices of O.N. Investment Management Company. If you have any questions about the contents of this Brochure, please contact us at (513) 794-6764 or fax (513) 794-4518. The information in this Brochure has not been approved or verified by the Securities and Exchange Commission (SEC) or by any state securities authority.

O.N. Investment Management Company is a Registered Investment Adviser. Registration of an Investment Adviser does not imply a level of skill or training. The oral and written communications of an Adviser provide you with information with which you determine to hire or retain an Adviser. Additional information about O.N. Investment Management Company also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD Number for O.N. Investment Management Company is 105662.

Summary of Material Changes

Pursuant to SEC Rules, this document serves as a summary of material changes to the ONIMCO Firm Brochure. The ONIMCO Firm Brochure was previously released on March 25, 2011 and was recently updated on March 23, 2012. The newly updated version of the ONIMCO Firm Brochure may be requested by calling (513) 794-6764 or by written request to the attention of O. N. Investment Management Company, P.O. Box 371, Cincinnati, OH 45201-0371.

Additional information about O.N. Investment Management Company is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with O.N. Investment Management Company who are registered, or are required to be registered, as Investment Adviser Representatives of O.N. Investment Management Company.

The information contained in this document may or may not apply to your unique situation. If you have questions regarding this information you may contact ONIMCO directly or consult with your local Investment Adviser Representative.

O. N. Investment Management Company recently updated product offerings to include **Curian Capital, LLC.** and **Morningstar Managed Plan Solutions (MMPS).**

Curian Capital LLC.

Curian Capital is a registered investment advisor providing fee-based separately managed accounts to individual investors. Each portfolio can be customized based on the investor's unique objectives, risk tolerance, time horizon, and tax situation. Customization options allow investors to exclude individual securities, asset classes, and certain social sectors. Curian's portfolios can be set up as strategic models that rebalance on an annual or semi-annual basis or as tactical portfolios with additional latitude in adjusting the portfolios depending on Curian's view of market conditions. This program may cost more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Morningstar Managed Plan Solutions (MMPS)

Morningstar Managed Plan Solutions was introduced to ONIMCO Investment Adviser Representatives ("IARs") in order to provide a product solution to help 401(k) plan sponsors manage their fiduciary responsibilities while helping participants make informed investment allocation decisions. MMPS helps plan sponsors by providing an investment policy statement, selecting and actively monitoring each of the plan's investment options, and creating asset allocation portfolios that collectively, satisfy the Qualified Default Investment Alternatives (QDIA) regulations.

If you would like more detailed information including the risks, fees, and costs associated with Curian Capital LLC and/or Morningstar Managed Plan Solutions you may contact either ONIMCO directly or your local Investment Adviser Representative.

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Item 4 – Advisory Business

O.N. Investment Management Company (ONIMCO)

Established in 1969, O.N. Investment Management Company (hereinafter “ONIMCO”) is a SEC Registered Investment Adviser and a subsidiary of The O.N. Equity Sales Company (hereinafter “ONESCO”), a full service broker/dealer registered with the SEC and FINRA. ONESCO is a wholly owned subsidiary of The Ohio National Life Insurance Company.

Through ONIMCO, Investment Adviser Representatives (hereinafter “IARs” or “advisers”) provide fee-based financial planning services and investment advisory services as described below.

ONIMCO advisers are required to maintain the FINRA Series 6 (Investment Company and Variable Contracts Registration) or the Series 7 (General Securities Registration), and must be authorized to act as an investment adviser under the state securities regulations for the states in which they conduct business. Generally, the state securities regulations require a representative to have a Series 65 (Uniform Investment Adviser Law), Series 66 (Uniform Combined State Law) or hold a certain professional designation.

Description of Services

Financial Planning Services

A financial plan is an outline designed to help provide you with recommendations of how to efficiently invest or allocate the money you currently have and help provide you with ideas of how to increase the value of your funds for the future.

In developing a personalized financial plan for clients, ONIMCO advisers may provide:

1. Comprehensive Financial Planning – Using approved software programs, ONIMCO advisers will assist you in developing a detailed strategy for your financial situation. The plan will cover present and anticipated assets and liabilities, including but not limited to insurance, savings, investments, and anticipated retirement or other employee benefits.
2. Modular Planning – More limited than a comprehensive financial plan, a modular plan will focus on a specific need such as: Retirement funding, College funding, or Estate planning. Approved software will also be used when performing Modular Planning.
3. Specialized Financial Services – Refers to services performed by ONIMCO advisers based on a specific client need which is charged at an hourly fee. These services are limited to specific topics within the financial planning area. Examples include but are not limited to: Insurance Analysis, Investment Analysis, Cash Flow Analysis, and Special Needs Planning.

The planning process often consists of two stages. In the first stage, your adviser will work with you as an objective adviser. He/she will help you determine your financial goals and objectives. Based on the information you provide, the investment adviser will create a plan tailored to your specific situation. The recommendations will be general in nature, in that they will not recommend any company’s specific products or securities, but will instead focus on strategies that you should consider in order to achieve the goals that you’ve identified as being most important to you.

Once your adviser has completed the plan, he/she will then review the plan with you and may offer to help you implement the plan. Once created, you are under no obligation to implement the plan or to continue working with the same adviser. However, if you do decide to put the plan to work utilizing the same adviser who created the plan, then he/she will work with you in order to choose the specific products that may be necessary to help you achieve your goals.

Investment Advisory Services

Investment Advisory Services refers to the process of recommending, managing, supervising, and monitoring your investments. ONIMCO advisers will help you with this process by performing a careful analysis of the information you provide about your current financial situation, risk tolerance, and financial goals. After reviewing this information, the adviser will then help you choose from several available sponsors with managed account programs in order to assist you with your investments. ONIMCO does not conduct its own securities analysis.

ONIMCO Investment Adviser Representatives may choose from a variety of fee-based asset management services including: separate account programs, mutual fund management programs, and asset management accounts. These services are often referred to as Wrap Fee Programs.

A Wrap Fee Program is defined as “any advisory program under which a specified fee or fees are charged for portfolio management or for the advice concerning the selection of other advisers.” The fees are not based directly on the transactions within your account, but rather on the percentage of assets under management. The fees are used to compensate the Program Sponsor, professional money managers (if applicable), ONIMCO, and the Investment Adviser Representative.

The following Program Sponsors are available through ONIMCO:

ONIMCO Advisor Blueprint *	Lockwood Advisors, Inc
Morningstar Managed Portfolios	Symmetry Partners
Genworth Financial	Lindner Capital Advisors
Brinker Capital	Envestnet Asset Management, Inc*
Curian Capital, LLC.	

* Denotes that an IAR-Directed program is available through the program sponsor. This means that your IAR will help select the specific investments used within your account.

Through these programs the ONIMCO Investment Adviser Representative may recommend utilizing Mutual Fund Wrap Products, Separately Managed Accounts (SMAs), Unified Managed Accounts (UMAs), or a combination of the above. These accounts can be utilized in connection with your existing investments or independent of your existing investments. Brief descriptions of these products are listed below:

- Mutual Fund Wrap Products – These products allow you access to diversified managed mutual fund and sometimes exchange-traded fund portfolios. These programs typically follow defined asset allocation strategies, which are managed over time to remain consistent with your objectives and risk tolerance. Quarterly fees are charged based on the asset value of the account.
- Separately Managed Accounts (SMAs) – Separately Managed Accounts are primarily designed for larger tax-sensitive portfolios where you may be seeking a high level of specialization. Portfolio management is

provided by institutional money managers that usually specialize in their respective asset classes or sectors. You, as the investor, have direct ownership of each stock or bond within the portfolio, but delegate the authority to make decisions about which securities to buy or sell to a professional money manager. A quarterly fee is charged based upon the asset value of the account. This fee typically covers portfolio management expenses, clearing and custody fees, trade fees, and the investment adviser's fee. Due to the specialization and access to the institutional money managers, the quarterly fee and minimum investment amount is typically higher than those of Mutual Fund Wrap Products.

- **Unified Managed Accounts (UMAs)** – Unified Managed Accounts are typically designed to combine the features of both SMAs and Wrap Accounts into one lower account minimum portfolio. The portfolios feature multiple investment products and professional money managers, including SMAs, mutual funds, and exchange-traded funds in one core account. The entire account is generally overseen by an overlay manager responsible for the strategy of the account.

* IAR-Directed Programs

ONIMCO Advisor Blueprint provided through Envestnet Portfolio Solutions offers the **Mutual Fund Choice** wrap program and an IAR-Directed **SMA Choice Account**. This program is unique because in lieu of having a professional money manager select and monitor which mutual funds should be utilized for your account, your ONIMCO Investment Adviser Representative will select the mutual funds on your behalf. The selections will be made based upon an asset allocation model once your investment objectives and risk tolerance has been determined. Asset Allocation refers to the spreading of investments among different asset classes, such as stocks, bonds, and cash reserves. The goal of asset allocation is to optimize the risk/reward tradeoff based upon your specific situations and goals.

Envestnet offers several programs including two IAR-Directed Programs: an **Advisor as Portfolio Manager** wrap fee program and an IAR-Directed **Unified Managed Account Program**. The Advisor as Portfolio Manager wrap fee program allows the IAR to construct a portfolio for you by utilizing a combination of individual stocks, mutual funds, and exchange-traded funds ("ETFs"). The IAR-Directed Unified Managed Account Program also allows the IAR the ability to construct a portfolio utilizing mutual funds, ETFs, and Separately Managed Accounts ("SMAs"). These portfolios are constructed by your representative based upon your specific investment objectives and risk tolerance, and the accounts are monitored and rebalanced by Envestnet. As previously stated on page two of this Brochure, Envestnet differs from other Managed Account Programs available through ONIMCO because your Investment Adviser Representative is provided discretionary authority within the account.

ONIMCO manages the following amount of assets (rounded to the nearest dollar):

Discretionary Amounts	Non-discretionary Amounts	Date Calculated
\$38,532,864	\$269,686,138	2/29/2012

With each of the wrap programs described above, ONIMCO Investment Adviser Representatives will assist with your initial asset allocation and monitor the accounts to provide reallocation of the assets as needed. You, as a client, are responsible for contacting the Investment Adviser Representative in order to provide updates to any material changes that may occur to your circumstances which may impact your goals and objectives for your accounts. In seeking investment advice, you are responsible for providing accurate information about your financial status, goals, and risk tolerance to help ensure that appropriate recommendations are provided.

Item 5 – Fees and Compensation

- Clients are charged either fixed fees or hourly fees for Financial Planning Services as described in further detail below. Fixed fees are charged for Comprehensive Financial Planning and Modular Planning. Hourly fees are charged for Specialized Financial Services.
- Clients utilizing ONIMCO's Investment Advisory Services are charged a fee based on a percentage of assets under management within the account as described in the following pages of this document.

Fees for Financial Planning Services

Comprehensive Financial Planning and Modular Planning

Clients are charged a fixed fee typically ranging from \$500 to \$5000 for Comprehensive Financial Planning. The amount charged is based upon the amount of assets and income level. The fee for modular planning will be less than that of a Comprehensive plan and will be based on the number of specific needs address by the representative and upon the amount of assets and income level. The fee is negotiable and may be more or less than the amount listed above on an exception basis. The fee will be disclosed in writing through the Client Advisory Agreement prior to engaging in the plan. By signing the Client Advisory Agreement you acknowledge the amount of the fee and agree to compensate ONIMCO for the services described. The IAR receives compensation for the financial plan after the plan is reviewed and approved by a Financial Plan Review Principal and then delivered by the representative. If you decide to terminate the Financial Planning agreement prior to the completion of the plan, payment will be owed for the time spent developing the financial plan prior to such termination. The amount due in the event of the termination will be a pro-rata amount based upon the degree of completion of the financial plan at the time the notification of termination was received.

Specialized Financial Services

Investment Adviser Representatives are compensated for performing Specialized Financial Services on an hourly basis. The hourly rate that an Investment Adviser Representative may charge for Specialized Financial Services will vary based upon his/her educational background, experience, and expertise in a particular area. The hourly rate and the estimated number of hours needed to complete the requested service will be disclosed in writing through the Client Advisory Agreement prior to engaging in the service. The number of hours needed to complete the plan will vary based upon the complexity of the request. If you decide to terminate the Financial Planning agreement prior to the completion of the Specialized Financial Services, payment will be owed for the time spent performing the services prior to such termination. The amount due in the event of the termination will be the hourly rate previously agreed upon multiplied by the number of hours the Investment Adviser Representative has spent on the services.

Checks for Financial Planning Services should be made payable to ONIMCO.

Fees for Investment Advisory Services

Summary

Annual fees for Investment Advisory Services are deducted directly from your account quarterly and are based upon the market value of the assets within the account. Direct billing of fees is not available. The fees deducted from the account are used to compensate the program sponsor, professional money managers (if applicable), the account custodian, ONIMCO, and the Investment Adviser Representative. The IAR's portion of the fees for the managed account programs are negotiable and may be adjusted at the discretion of the individual IAR but may not exceed the schedule set forth by ONIMCO and described herein. All ONIMCO clients of the same size may not pay the same fee. Similar services may be available from other investment advisory firms for fees which are lower than, equal to, or higher than ONIMCO's fees.

Depending upon the product chosen, fees may be deducted in advance or in arrears of the most recent quarter. If the account is closed and all assets are withdrawn from the account prior to the end of the calendar quarter for which fees have been paid in advance, the unearned portion of those fees will be refunded by the program sponsor on a pro-rata basis.

Portfolio managers offering mutual funds and exchange-traded funds (ETFs) pass their internal transaction and execution cost on to the shareholders of their funds. Such investments companies also pass the cost of compensating their management/research personnel, as well as the cost of other internal administrative services, on to the shareholder. In addition, some portfolio managers pay 12b-1 service fees, distribution fees, recordkeeping fees, and/or shareholder accounting fees to custodians and broker-dealers which offer such funds to the clients. These fees reduce the net asset value of mutual fund/ETF shares and are thus indirectly borne by fund shareholders, including clients of ONIMCO who may hold such investments. For specific information regarding these fees please consult the fund's prospectus.

Each program sponsor available through ONIMCO has its own unique fee schedule. Program sponsors provide a tiered fee schedule where larger account sizes may receive a reduced fee. A separate disclosure document containing the fee schedule of the program sponsor and professional money manager will be provided upon recommendation of that service and will be furnished by the program sponsor. Prior to investing, you should read all disclosure materials carefully and consult with your Investment Adviser Representative to ensure your full understanding of the fees involved and services provided within each program. A summary description of the products available through each program sponsor and their fee schedule is included with this section.

ONIMCO Advisor Blueprint

Advisor Blueprint - Mutual Fund, Mutual Fund Choice, Income and Enhanced-Index Models

ONIMCO offers several products in conjunction with Envestnet Portfolio Solutions through the Advisor Blueprint Platform. There are two mutual fund wrap products (Mutual Fund and the Mutual Fund Choice). Envestnet Portfolio Solutions provides the allocation services, platform, performance reporting, investment selection and rebalancing for the Mutual Fund Model. The ONIMCO IAR provides the investment selection and rebalancing functions for the Mutual Fund Choice Model.

In addition to the two wrap products, there are two other Advisor Blueprint products that follow a similar fee structure. The Income Portfolio is designed to emphasize income generating strategies and the Enhanced Index Portfolios is a program leveraging active vs. passive research. The fees listed below are inclusive of all fees with the exception of individual mutual fund management fees for any funds used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule for Mutual Fund Choice (Advisor Directed):

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$299K	.25%	Included	1.50%	1.75%
\$300K-\$599K	.22%	Included	1.50%	1.72%
\$600K-\$999K	.18%	Included	1.50%	1.68%
>\$1MM	.15%	Included	1.50%	1.65%
Fees are deducted quarterly in advance based upon the average daily fair market value during the previous calendar quarter. Fees are charged on the entire account balance based upon the breakpoint schedule listed above. Clients may cancel agreements anytime and the fees will be pro-rated.				

Fee Schedule for Mutual Fund, Income and Enhanced-Index Models:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$299K	.30%	Included	1.50%	1.80%
\$300K-\$599K	.25%	Included	1.50%	1.75%
\$600K-\$999K	.20%	Included	1.50%	1.70%
>\$1MM	.15%	Included	1.50%	1.65%
Fees are deducted quarterly in advance based upon the average daily fair market value during the previous calendar quarter. Fees are charged on the entire account balance based upon the breakpoint schedule listed above. Clients may cancel agreements anytime and the fees will be pro-rated.				

Advisor Blueprint - Unified Managed Account (UMA)

ONIMCO Advisor Blueprint also offers a Unified Managed Account (UMA). This is an Envestnet Portfolio Solutions driven separately managed account that invests from a universe of mutual funds, exchange traded funds (ETFs), and Envestnet Portfolio Solutions recommended Separate Account Managers. The fees listed below are inclusive of all fees with the exception of individual mutual fund management fees for any funds used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$2MM	.70%	.20% \$499K and under, .18% \$500K and up	1.50%	2.40%
>\$2MM	.65%	.18%	1.50%	2.33%
Fees are deducted quarterly in advance based upon the average daily fair market value during each previous calendar quarter. Fees are charged on the entire account balance as listed above. Clients may cancel agreements anytime and the fees will be pro-rated.				

Advisor Blueprint - SMA Choice Account

ONIMCO Advisor Blueprint also offers an IAR-directed Separate Account Program. Envestnet Portfolio Solutions maintains a recommended Separate Account Manager list that the Investment Advisor can select from to allocate the portfolio. Each Separate Account Manager will have a separate fee in addition to the fees listed below. The fees will vary depending on factors such as investment style and account size. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$499K	.35%	.20%	1.50%	2.05%
\$500-\$1MM	.30%	.18%	1.50%	1.98%
\$1MM-\$3MM	.25%	.18%	1.50%	1.93%
>\$3MM	.20%	.18%	1.50%	1.88%
Fees are billed quarterly in advance based upon the average daily fair market value during the previous calendar quarter. Fees are charged on the entire account balance as listed above. Clients may cancel agreements anytime and fees will be pro-rated.				

Morningstar Managed Portfolios

Morningstar - Mutual Fund Wrap Account

Morningstar offers a mutual fund wrap account directed by Morningstar. The fees listed below are inclusive of all fees with the exception of individual mutual fund management fees for any funds used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
First \$500K	.40%	Included	1.10%	1.50%
Next \$500K	.35%	Included	1.05%	1.45%
Next \$1MM	.30%	Included	1.00%	1.30%
Over \$2MM	.20%	Included	.90%	1.10%
Fees are billed quarterly in arrears based upon the average daily fair market value during each previous calendar quarter. Fees are charged on the entire account balance as listed above. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Morningstar - ETF Wrap Account

Morningstar offers an ETF wrap account directed by Morningstar. The fees listed below are inclusive of all fees with the exception of individual management fees for the ETFs used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
First \$1MM	.31%	.13% -.05%	1.10%	1.54%
Next \$4MM	.25%	.05%	1.10%	1.40%
Over \$5MM	.20%	.05%	1.10%	1.35%
Fees are billed quarterly in advance based upon the average daily fair market value during each previous calendar quarter. Client may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels listed above.				

Morningstar - Stock Basket Account

Morningstar also offers several managed stock portfolios including a Custom Series and three Strategist Series of portfolios that follow a growth, value, dividend and wide moat investment strategies. Wide moat refers to stocks of companies which Morningstar feels has a competitive advantage within their industry. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
First \$1MM	.55%	.13% -.05%	1.10%	1.78%
Next \$4MM	.50%	.05%	1.10%	1.65%
Over \$5MM	.45%	.05%	1.10%	1.60%
Fees are billed quarterly in advance based upon the average daily fair market value during the previous calendar quarter. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels listed above.				

Morningstar – Managed Plan Solutions (MMPS)

Morningstar Managed Plan Solutions was introduced to ONIMCO IARs in order to provide a product solution to help 401(k) plan sponsors manage their fiduciary responsibilities while helping participants make informed investment allocation decisions. MMPS helps plan sponsors by providing an investment policy statement, selecting and actively monitoring each of the plan's investment options, and creating asset allocation portfolios that collectively, satisfy the Qualified Default Investment Alternatives (QDIA) regulations. To deliver the Managed Plan Solutions suite of services, Morningstar Investment Services has teamed up with three open architecture recordkeeping platforms. ASPIre Financial Services, ExpertPlan, Inc., and The Online 401(k). Each firm serves as a hub, allowing seamless integration of all the program's components. On all platforms, the MPS fee is 30 bps for plans under \$5 million and 25 bps for plans over \$5 million in AUM. The IAR fees are negotiated with the plan sponsor and can be .25%, .50% or .75%. The IARs support the plans by introducing qualified plans sponsors and providing support in completing plan paperwork and on-going plan participant education in regard to the plan and available investment options.

Additional fees may apply depending upon which recordkeeping platform is chosen for the plan. Plans could be charged additional fees for services such as: plan set up, annual administration, custody, and various recordkeeping and custodial services (for example, conversions, distributions, loans, etc.). Other fees may apply and may vary by TPA firm.

Genworth Financial

Genworth – Mutual Fund Wrap / ETF Wrap Accounts

Genworth offers a mutual fund wrap and an ETF wrap account. The fees listed below are inclusive of all fees with the exception of individual fund management fees for any funds used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Genworth Mutual Fund Wrap - Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$100K	.45%	\$150 /yr	1.35%	1.80%
\$100K-\$250K	.45%	\$150/yr	1.35%	1.80%
\$250K-\$500K	.40%	\$150/yr	1.35%	1.75%
\$500K-\$1MM	.35%	\$150/yr	1.35%	1.70%
\$1MM-\$2MM	.30%	\$150/yr	1.35%	1.65%
\$2MM-\$3MM	.20%	\$150/yr	1.35%	1.55%
\$3MM-\$5MM	.20%	\$150/yr	1.35%	1.55%
Over \$5MM	.20%	\$150/yr	1.35%	1.55%

Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.

Genworth ETF Wrap – Fee Schedule

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$100K	.65%	.25% - .05%	1.35%	2.25%
\$100K-\$250K	.65%	.25% - .05%	1.35%	2.25%
\$250K-\$500K	.60%	.25% - .05%	1.35%	2.20%
\$500K-\$1MM	.55%	.25% - .05%	1.35%	2.15%
\$1MM-\$2MM	.50%	.25% - .05%	1.35%	2.10%

\$2MM-\$3MM	.40%	.25% - .05%	1.35%	2.00%
\$3MM-\$5MM	.40%	.25% - .05%	1.35%	2.00%
Over \$5MM	.40%	.25% - .05%	1.35%	2.00%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Genworth - Unified Managed Accounts (UMAs)

Genworth offers three Unified Managed Accounts (UMAs): Genworth Multiple Strategy, Privately Managed Portfolios, and Active Return Portfolios. These are Genworth-driven SMA accounts which invest in a mutual funds, exchange traded funds (ETFs), and Genworth recommended Separate Account Managers. The fees listed below are inclusive of all fees with the exception of individual mutual fund management fees for any funds/ETFs used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Genworth – Genworth Multiple Strategy

Account Level Assets	Max Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$100K	.85%	Included	1.35%	2.20%
\$100K-\$250K	.85%	Included	1.35%	2.20%
\$250K-\$500K	.85%	Included	1.35%	2.20%
\$500K-\$1MM	.70%	Included	1.35%	2.05%
\$1MM-\$2MM	.47%	Included	1.35%	1.82%
\$2MM-\$3MM	.47%	Included	1.35%	1.82%
\$3MM-\$5MM	.47%	Included	1.35%	1.82%
Over \$5MM	.25%	Included	1.35%	1.60%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Genworth - Privately Managed Portfolios (PMP) and Active Return Opportunities (ARO):

Account Level Assets	Max Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0-\$100K	.85%	Included	1.35%	2.20%
\$100K-\$250K	.85%	Included	1.35%	2.20%
\$250K-\$500K	.85%	Included	1.35%	2.20%
\$500K-\$1MM	.70%	Included	1.35%	2.05%
\$1MM-\$2MM	.47%	Included	1.35%	1.82%
\$2MM-\$3MM	.47%	Included	1.35%	1.82%
\$3MM-\$5MM	.47%	Included	1.35%	1.82%
Over \$5MM	.25%	Included	1.35%	1.60%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Brinker Capital

Mutual Fund Wrap Account - Brinker Capital Destinations

Brinker Capital Destinations is managed by Brinker Capital and invests in mutual funds. The fees listed below are inclusive of all fees with the exception of individual mutual fund management fees for any funds used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$50K-\$75K	.75%	Included	1.50%	2.25%
\$75K-\$100K	.55%	Included	1.50%	2.05%
\$100K+	.25%	Included	1.50%	1.75%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

SMA Product – Brinker Core Asset Manager

Brinker offers an SMA account called the Core Asset Manager. Available investments include over 60 separate account managers, mutual funds, ETFs and possibly alternative investments. The fees in the grid below are an approximate guide to the costs associated with this product expressed in a range. The actual costs may vary slightly depending on the exact allocation, number of managers, and manager selection. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0K-\$500K	.85%-1.40%	Included	1.50%	2.90%
\$500K-\$750K	.85%-1.35%	Included	1.50%	2.85%
\$750K-\$1MM	.80%-1.30%	Included	1.50%	2.80%
\$1MM-\$1.5MM	.75%-1.25%	Included	1.50%	2.75%
\$1.5MM-\$2MM	.75%-1.20%	Included	1.50%	2.70%
\$2MM-\$3MM	.70%-1.15%	Included	1.50%	2.65%
\$3MM-\$4MM	.65%-1.10%	Included	1.50%	2.60%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Brinker Capital – Unified Managed Account (UMA)

Brinker Capital also offers a Brinker-directed UMA account utilizing asset allocation strategies which incorporate managed accounts, mutual funds and ETFs into one diversified portfolio. The fees in the grid below are an approximate guide to the costs associated with this product expressed in a range. The actual costs may vary slightly depending on the exact allocation, number of managers, and manager selection. If mutual funds or alternative investments are included in the allocation, the internal operating costs associated with these investments are not included. This program may cost more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$0K-\$250K	.65%-1.15%	Included	1.50%	2.65%
\$250K-\$500K	.60%-1.05%	Included	1.50%	2.55%
\$500K-\$750K	.55%-1.00%	Included	1.50%	2.50%
\$750K-\$1MM	.50%-.95%	Included	1.50%	2.45%
\$1MM-\$1.5MM	.45%-.90%	Included	1.50%	2.40%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Lockwood Advisors, Inc.

Lockwood Advisors offers a mutual fund/ETF wrap product called Lockwood Asset Allocation Portfolios. The Lockwood Asset Allocation Portfolios are diversified asset allocation strategies which are designed to meet specific risk tolerances. Mutual funds/ETF internal management expenses are not included below. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Lockwood Asset Allocation Portfolios Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
First \$500K	.40%	Included	1.50%	1.90%
Next \$500K	.35%	Included	1.50%	1.85%
Next \$4MM	.30%	Included	1.50%	1.80%
Next \$5MM	.25%	Included	1.50%	1.75%
Over \$10MM	.20%	Included	1.50%	1.70%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Lockwood – SMA Account

Lockwood also provides a Separately Managed Account offering which allows access a diverse list of money managers. The fee schedule includes the money manager, clearing and custody and the Lockwood Advisors fees. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Equity/Balanced	Fixed Income	Max Advisor Fee	Maximum Total Fee
First \$500K	.95%	.57%	1.50%	2.45%
Next \$500K	.90%	.54%	1.50%	2.40%
Next \$4MM	.85%	.51%	1.50%	2.35%
Over \$5MM	.75%	.47	1.50%	2.25%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Lockwood Investment Strategies - (UMA)

Lockwood also provides a UMA account called the Lockwood Investment Strategies (LIS). LIS is a Lockwood driven multi-disciplined managed account housed in a single portfolio. The accounts can be invested in mutual funds, ETFs as well as SMAs. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
First \$500K	.75%	Included	1.50%	2.25%
Next \$500K	.55%	Included	1.50%	2.05%
Next \$4MM	.40%	Included	1.50%	1.90%
Next \$5MM	.35%	Included	1.50%	1.85%
Over \$10MM	.30%	Included	1.50%	1.08%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Symmetry Partners

Symmetry Partners offers a mutual fund wrap program utilizing Dimensional Fund Advisors (DFA) Funds. These funds are passive in nature. Passive investing refers to an investment strategy involving limited ongoing buying and selling of investments with a goal of long-term appreciation. The fees listed below are inclusive of all fees with the exception of individual mutual fund management fees for any funds used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
First \$1MM	.50%	<100K .24% >100K .20%	1.50%	2.24%
Next \$2MM	.45%	.20%	1.50%	2.15%
Next \$2MM	.40%	.20%	1.50%	2.10%
Over \$5MM	Case-by-case	.20%	1.50%	Case-by-case
Fees are billed quarterly in arrears and accounts are charged on a pro-rata basis when assets arrive in mid-period. Fee is also pro-rated when account is closed mid-period. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Lindner Capital

Lindner Capital offers a mutual fund wrap program primarily utilizing Dimensional Fund Advisors (DFA) Funds. Global Portfolios are for accounts from \$50,000 to \$100,000 and are invested in a single diversified DFA Fund solution. Traditional portfolios offer diversified portfolios utilizing mostly DFA Funds and potentially ETF or managed futures funds options. The fees listed below are inclusive of all fees with the exception of individual mutual fund management fees for any funds used within the portfolios. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs. Accounts valued below \$100,000 may incur an additional fee of \$200 initial and \$50 per year.

Fee Schedule:

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$50K-\$249,999	.60%	\$15-\$25 per transaction	2.00%	2.60%
\$250K-\$599,999	.55%	\$15-\$25 per transaction	2.00%	2.55%
\$600K-\$999,999	.50%	\$15-\$25 per transaction	2.00%	2.50%
\$1MM-\$4.9MM	.45%	\$15-\$25 per transaction	2.00%	2.45%
\$5MM-\$9.9MM	.40%	\$15-\$25 per transaction	2.00%	2.40%
\$10MM-\$24.9MM	.35%	\$15-\$25 per transaction	2.00%	2.35%
Over \$25M	Negotiable	\$15-\$25 per transaction	2.00%	Negotiable
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are charged on the entire account balance based upon the breakpoint schedule listed above.				

Envestnet Asset Management, Inc.

ONIMCO offers several products through the Envestnet Asset Management, Inc. There is an SMA program that allows advisors the ability to construct diversified portfolios using the approved list of separate account managers that is maintained by Envestnet's advisory arm, Portfolio Management Company (PMC). Envestnet also has a mutual fund/ETF asset allocation product that is managed by Envestnet using various third party asset management providers. There is a UMA product that combines Separate Account Managers (SMAs), ETFs, and mutual funds in a single portfolio. There is also an IAR-driven account called Rep as Portfolio Manager which allows ONIMCO IARs to create and maintain models using individual securities, mutual funds, and ETFs. The fees listed below do not include any third party money managers or SMA manager fees (if applicable) which would be included and fully disclosed when a proposal is created using such products. These additional fees would also be disclosed through Envestnet's ADV Part 2 and/or the ADV Part 2 of the specific SMA manager. These documents will be provided at the time of the proposal. The fee range for these accounts depend on investment amount, management style and asset class. The fees listed below do not include the individual mutual fund/ETF management fees for the funds used within the portfolios. This program may cost more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Envestnet Platform SMA Account (Equity & Balanced) – fees may be reduced for fixed income SMA and mutual fund solutions

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee (not including SMA Fee)
\$100K-\$499K	.35%	.15%	1.50%	2.00%
\$500K-\$999K	.30%	.10%	1.50%	1.90%
\$1MM-\$2MM	.25%	.05%	1.00%	1.30%
Over \$2MM	.20%	.05%	1.00%	1.25%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Envestnet - Strategist Account (Third Party Money Managers)

Account Level Assets	Platform Fee bundled with strategist fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Fee (not including add'l strategist/platform Fee)
\$50K-\$499K	(see ADV Part2 of Strategist)	.15%	1.50%	1.65%
\$500K-\$999K	(see ADV Part2 of Strategist)	.10%	1.50%	1.60%
Over \$1MM	(see ADV Part2 of Strategist)	.05%	1.00%	1.05%

	of Strategist)			
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Envestnet - Unified Managed Account (UMA) Fees

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee (not including SMA Fees)
\$150K-\$499K	.30%	.15%	1.50%	1.95%
\$500K-\$999K	.30%	.10%	1.50%	1.90%
\$1MM-\$5MM	.25%	.05%	1.00%	1.30%
Over \$5MM	.20%	.05%	1.00%	1.25%
Fees are billed quarterly in advance. Client may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Envestnet - Rep as Portfolio Manager Account

Account Level Assets	Platform Fee	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
\$25K-\$49K	.19%	.21%	1.50%	1.90%
\$50K-\$99K	.19%	.16%	1.50%	1.85%
\$100K-\$249K	.19%	.11%	1.50%	1.80%
\$250K-\$499K	.18%	.10%	1.50%	1.78%
\$500K-\$999K	.17%	.09%	1.50%	1.76%
Over \$1MM	.15%	.09%	1.00%	1.24%
Fees are billed quarterly in advance. Clients may cancel agreements anytime and fees will be pro-rated. Fees are tiered so the lower fee only applies to assets above the breakpoint levels.				

Curian Capital LLC

Curian Capital provides clients access to institutional money managers whose experience and expertise typically is available only to wealthy individuals and institutions. Each portfolio can be customized based on the investor's unique objectives, risk tolerance, time horizon, and tax situation. Customization options allow investors to exclude individual securities, asset classes, and certain social sectors. Curian's portfolios can be set up as strategic models that rebalance on an annual or semi-annual basis or as tactical portfolios with additional latitude in adjusting the portfolios depending on Curian's view of market conditions. This program may cost the client more or less than purchasing such services separately based upon several factors including the size of accounts, trading frequency and costs.

Fee Schedule:

Accounts Level Assets	Platform Fee (varies with investment style)	Clearing & Custody Fee	Max Advisor Fee	Maximum Total Fee
First \$99,999	.40%-.85%	Up to .40%	1.50%	2.99%
Next \$150,000	.40%-.75%	Up to .40%	1.50%	2.99%
Next \$250,000	.25%-.65%	Up to .40%	1.50%	2.99%
Next \$500,000	.20%-.55%	Up to .40%	1.50%	2.99%
Next \$1M	.12%-.50%	Up to .40%	1.50%	2.99%
Next \$3M	.09%-.40%	Up to .40%	1.50%	2.99%
Above \$5M	.06%-.30%	Up to .40%	1.50%	2.99%
Additional transactional charges, including custodial set-up and termination fees may apply.				

Item 6 – Performance-Based Fees and Side-By-Side Management

This section is not applicable.

ONIMCO and ONIMCO's Investment Adviser Representatives do not charge or accept performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) nor do we enter into performance-based fee arrangements with clients.

Item 7 – Types of Clients

ONIMCO advisers provide services to individuals, families, trusts, estates, charitable organizations, businesses, and other organizations throughout the United States.

Financial Planning Services – Account Minimums

ONIMCO generally does not impose a minimum dollar of amount assets in order to provide financial planning services, but reserves the right to do so on a case-by-case basis.

Investment Advisory Services - Account Minimums

The minimum investment amount needed to open an investment management account ranges from \$25,000 - \$1,000,000 depending upon both the Program Sponsor and product selected within the sponsor's program. Each sponsor and product will have its own set minimum investment amount which may be higher than \$25,000. Mutual fund wrap accounts will typically have lower fees than SMAs and UMAs. Please refer to the Program Sponsor's materials for the specific account minimum for each product offering and consult your Investment Adviser Representative for further assistance.

Item 8 – Method of Analysis, Investment Strategies, and Risk of Loss

Financial Planning Services

As part of the financial planning process, an ONIMCO Investment Adviser Representative will work with you to collect important background information about your individual situation in order to help identify needs and opportunities which will serve as the basis for the IAR's recommendations. Comprehensive Financial Plans are produced using computer software programs approved for use by ONIMCO. Financial Plans will typically explore "what if" type scenarios allowing the IAR to present recommendations in consideration of these events. The recommendations will typically be general in nature yet unique to your specific situation. For example, the recommendation may identify a need such as: additional life insurance coverage for you and your spouse, but will not recommend the purchase of a specific company's life insurance product. The recommendations will typically address the tools and general investment categories that you should consider when implementing the plan, but will not offer specific legal or tax advice.

As part of the effort to understand your unique situation, the IAR may ask to review financial documents or may coordinate a review with other professionals such as attorneys, accountants, or consultants that you currently work with. Your investment adviser will help you analyze areas such as: asset allocation and investment planning, income protection needs, tax considerations, retirement planning, education planning, estate planning, and other areas. The recommended strategies in your plan will be based on careful analysis of the information you provided about your current financial situation, risk tolerance, and long-term financial goals.

It is important to understand that any investment involves certain risks. ONIMCO and the Investment Adviser Representative do not make any representation or provide any warranty as to any investment return that may or may not be realized as a consequence of following the Financial Plan or Specialized Financial Services developed on your behalf. You should understand that it is possible to lose money by implementing the Financial Plan or Specialized Financial Services. Any recommendations or advice offered by ONIMCO and the Investment Adviser Representative is not legal advice or accounting advice. You should coordinate and discuss the impact of any financial advice with an attorney and/or tax professional.

Investment Advisory Services

If engaged to provide investment advisory services, the Investment Adviser Representative will first evaluate your current financial situation, needs, goals, objectives, and tolerance for risk. Upon reviewing these factors the IAR will assist you in selecting a program sponsor and investment products to help you achieve your goals. Each individual client's situation is unique, so product selection may vary based upon your individual needs. Asset allocation and investment decisions are then made to, in the representative's best judgment, help you achieve your overall financial objectives while minimizing risk exposure. Asset allocation is a key component of investment portfolio design, but does not assure a gain and does not protect against a loss in declining markets. Many investment professionals believe that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, high quality vs. high yield, etc.) is the primary determinant of portfolio returns and critical in the long-term success of one's financial objectives. ONIMCO encourages the Investment Adviser Representatives using the IAR-Directed programs to employ fundamental, long-term, buy-and-hold philosophies and approaches in their investment selection and implementation strategies. Recommendations provided are based upon publicly available reports, analysis, research materials and computerized asset allocation models.

No guarantees can be offered that your goals and objectives will be achieved. Additionally, no promises or assumptions can be made that the advisory services offered through ONIMCO will provide a better return than other investment strategies. The strategies that are recommended generally do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9 – Disciplinary Information

Registered Investment Advisers such as ONIMCO are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. ONIMCO has no disciplinary history and consequently, is not subject to any disciplinary disclosures.

Item 10 – Other Financial Industry Activities and Affiliations

ONIMCO is a subsidiary of The O.N. Equity Sales Company (ONESCO), a full service broker/dealer registered with the SEC and FINRA. ONIMCO's Investment Adviser Representatives are also Registered Representatives of ONESCO and effect securities transactions for compensation for customers. Investment Adviser Representatives are also agents of various insurance companies and may hold other licenses. Following the creation of a financial plan, the IAR may then, at your request, act in the capacity of a FINRA Registered Representative, Investment Adviser Representative, or insurance agent. The IAR may then recommend the purchase of securities products that have a sales load or a commission that the IAR would receive upon the client's purchase of a product, which creates a potential conflict between the interests of the IAR and the interests of the client. Once a financial plan is created you are under no obligation to act on the recommendations of ONIMCO or its representative. If you choose to act on the recommendations of your IAR, you are under no obligation to effect any investment, insurance, real estate, or

securities transaction through ONIMCO or its affiliates. In order to address the potential conflicts of interest that exist, the financial plans are reviewed by a Financial Plan Review Principal employed by ONIMCO to verify that the recommendations are appropriate based upon your specific needs.

ONIMCO is affiliated with The Ohio National Life Insurance Company (ONLIC) and Ohio National Life Assurance Corporation (ONLAC), as well as Ohio National Investments Incorporated (ONII) which is also an investment adviser registered with the SEC. ONIMCO is also affiliated with Fiduciary Capital Management, Inc. (FCM) and Suffolk Capital Management, LLC (Suffolk) which are both Investment Advisers registered with the SEC and under common control of Ohio National Mutual Holdings, Inc. ONIMCO's principal executive officers are also principal executive officers of the affiliated companies.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

ONIMCO adopted a written Code of Ethics and its Investment Adviser Representatives are required to acknowledge receipt and understanding of the Code of Ethics upon registration.

The Code of Ethics sets forth a standard of conduct and professionalism that applies to all persons designated by the Rule of Supervised Persons and Access Persons of ONIMCO. The Code of Ethics is designed to protect ONIMCO's clients by establishing standards of ethical conduct, deterring unethical behavior, and protecting against violations of federal securities laws.

It is ONIMCO's policy that all business must be conducted in accordance with the highest moral and ethical standards as set forth in the Code of Ethics (the "Code"). It includes moral, fiduciary, legal, and ethical standards and requirements that must be satisfied in order to comply with the Code. The Code also establishes procedures that must be followed to insure compliance with the Code. It also includes provisions relating to the confidentiality of client information.

ONIMCO will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Neither ONIMCO nor ONIMCO's Investment Adviser Representatives have a participation or interest in client transactions.

As stated under Item 10, Fiduciary Capital Management, Inc. (FCM) and Suffolk Capital Management, LLC (Suffolk) are related persons of ONIMCO and are both investment advisers registered with the SEC. These companies are considered related persons as they are under common control of Ohio National Financial Services, Inc.

FCM may occasionally purchase for client accounts Guaranteed Investment Contracts (GICs) issued by Ohio National Life Insurance Company (ONLIC). FCM is particularly scrupulous in their evaluation of ONLIC's credit worthiness and in holding up any decisions to purchase ONLIC GICs to the same or even greater scrutiny as they would those from another issuer. At the same time, it is important to remember that the rules governed by the Employee Retirement Income Security Act (ERISA) hold FCM accountable for decisions that are solely in the best interests of participants.

Suffolk may buy or sell securities that it recommends to its own clients. Solely as shareholder and/or investor, Suffolk or a related person may hold positions in securities held by clients. However, conflicts of interest are

addressed by the application of company rules governing personal securities transactions which mandate that clients not be disadvantaged by such transactions.

Personal Trading

ONIMCO representatives may buy or sell securities that it recommends to their ONIMCO clients. Trades placed by representatives in their own brokerage accounts are reviewed to prevent prohibited transactions. ONIMCO's Code of Ethics specifically addresses prohibited transactions, reporting violations, and possible sanctions for violations of the Code which each IAR of ONIMCO is required to sign, acknowledge, and adhere to.

Item 12 – Brokerage Practices

ONIMCO Investment Adviser Representatives do not recommend specific broker/dealers when engaging in Financial Planning Services for clients. Neither ONIMCO nor its Investment Adviser Representatives receive any research, products, or other "soft dollar benefits" in connection with client securities transactions.

Suffolk may receive research services provided by brokers including statistical research and other factual information and services. These services may include investment research reports, access to analyst, trading analytics, reports or databases containing corporate and fundamental analyses; information on the economy, industries and groups of securities; political developments; and legal developments affecting portfolio securities. The research provided by broker/dealers is supplemental to Suffolk's own research efforts. In certain cases, Suffolk specifically allocates brokerage for research services, which would otherwise be purchased for cash. To the extent that such research services are provided by others, Suffolk is relieved of expenses it may otherwise incur. In some cases, research services are generated by third parties but provided to Suffolk by or through broker/dealers. Research obtained in this manner may be used in servicing any or all clients of Suffolk and may be used in connection with clients other than those clients whose brokerage commissions are used to acquire the research services. With regard to selection of the broker/dealers used to acquire research services, Suffolk always considers its best execution obligation in deciding which broker/dealer to utilize.

Item 13 – Review of Accounts

Financial Planning Services – The proposed Financial Plans are submitted to the Home Office and are reviewed by designated Financial Plan Review Principals to verify that the recommendations are appropriate based upon your individual needs.

Investment Management Services – Designated Home Office personal of ONIMCO will review all new account applications to determine whether the account selected will be suitable based upon your specific financial goals and needs. The accounts are subject to exception reporting on a regular basis. The exception reporting is designed to identify unusual activity within the accounts or potential areas of concern.

Performance Reports are provided by the Program Sponsors on a quarterly basis.

Item 14 – Client Referrals and Other Compensation

ONIMCO receives payment in connection with giving advice to clients through its solicitation agreements with the available programs. ONIMCO's obligations under the solicitation agreements generally include collecting client information, providing clients with information regarding the program, and updating client information. ONIMCO and the IARs receive compensation from the programs for performing these services.

Item 15 – Custody

Custody of Client Assets

ONIMCO does not maintain physical custody of client funds or securities. Investment accounts are established with a "qualified custodian," namely a broker/dealer, bank or trust company. Each client has a direct relationship with their custodian. Clients participating in Lockwood Managed Accounts, ONIMCO Advisor Blueprint, and Envestnet receive periodic account statements from The O.N. Equity Sales Company's clearing firm, Pershing, LLC. Account statements are typically issued quarterly, but may be sent more frequently depending upon the activity within the account. Statements are also received by clients directly from the program managers and will be delivered at least quarterly.

Item 16 – Investment Discretion

ONIMCO IARs have discretionary authority over assets held within the Envestnet Platform. Discretionary authority is when your Investment Adviser Representative has the control to decide which securities to buy and sell, or which investment advisers / professional money managers to retain on your behalf without first obtaining your consent prior to the transaction. Your Investment Adviser Representative's discretionary authority is limited to the choice of investments/advisers available within the program. The representative does not have the ability to add or remove assets from the account without your prior authorization. The representative's discretionary authority is to be exercised in a manner consistent with your stated investment objectives established for the account.

ONIMCO IARs do not have discretionary authority over the other Program Sponsors available through ONIMCO and must first obtain your consent prior to changing investments within these accounts.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, ONIMCO does not have authority to and does not vote proxies on behalf of advisory clients. You will receive the proxies or other solicitations directly from the custodian or transfer agent, or depending upon the program, this responsibility is deferred to the professional money manager to be made on your behalf. ONIMCO IARs may assist you with questions regarding proxy voting if requested to do so, but generally these questions should be directed to the issuer of the security.

Item 18 – Financial Information

ONIMCO does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure. Neither ONIMCO nor its management have any financial conditions that is likely to reasonably impair the ability to meet contractual commitments to clients. ONIMCO has never been the subject of a bankruptcy petition.