

# **PART 2A Appendix 1 of Form ADV**

## **Asset Allocation Program Brochure • November 11, 2016**

This program brochure provides information about the qualifications and business practices of Ameritas Investment Corp. If you have any questions about the contents of this brochure, please contact us at (800) 335-9858, or by email at [AmeritasInvestmentCorp@ameritas.com](mailto:AmeritasInvestmentCorp@ameritas.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Ameritas Investment Corp. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration as an Investment Adviser does not imply a certain level of skill or training.



**Ameritas Investment Corp.**  
Member FINRA/SIPC

5900 O Street / Lincoln, NE 68510 / (800) 335-9858

## **MATERIAL CHANGES**

**There have been no material changes since the last publication.**

## TABLE OF CONTENTS

<b>MATERIAL CHANGES .....</b>	<b>2</b>
<b>TABLE OF CONTENTS.....</b>	<b>3</b>
<b>SERVICES, FEES AND COMPENSATION.....</b>	<b>4</b>
SERVICES.....	4
FEES.....	5
<b>ACCOUNT REQUIREMENTS AND TYPE OF CLIENTS.....</b>	<b>6</b>
<b>PORTFOLIO MANAGER SELECTION AND EVALUATION .....</b>	<b>6</b>
<b>CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS.....</b>	<b>7</b>
<b>CLIENT CONTACT WITH PORTFOLIO MANAGERS .....</b>	<b>8</b>
<b>ADDITIONAL INFORMATION .....</b>	<b>8</b>
DISCIPLINARY INFORMATION.....	8
OTHER FINANCIAL INDUSTRY ACTIVITIES .....	9
CODE OF ETHICS SUMMARY .....	11
PARTICIPATION IN CLIENT TRANSACTIONS AND ADDITIONAL COMPENSATION RECEIVED .....	11
REVIEW OF ACCOUNTS .....	12
CLIENT REFERRALS AND OTHER COMPENSATION.....	12
FINANCIAL INFORMATION.....	12
<b>IMPORTANT PRIVACY CHOICES .....</b>	<b>12</b>

## SERVICES, FEES AND COMPENSATION

### Services

#### Investment-Related Services

The Asset Allocation Program is an asset allocation service available for no additional charge from Ameritas Investment Corp. (“AIC”), in which AIC, as a corporate entity, acts as your investment advisor for the limited purpose of offering and periodically updating models that you choose within your variable insurance product (“Variable Products”) issued by affiliate Ameritas Life Insurance Corp. (“Ameritas Life”). Asset allocation allows you to diversify among asset classes and helps you attain your investment goals while helping you reduce volatility over the long term. An unaffiliated third party investment advisor provides research and business support services reviewing the models and selecting the specific funds to populate each model from those available in the Variable Products. AIC relies on the unaffiliated third party investment advisor to update the models. AIC provides certain services, such as assisting you in completing the Program questionnaire and applicable account opening forms for the Asset Allocation Program.

As part of the Asset Allocation Program, AIC offers several asset allocation models (Asset Allocation Models or Models), each based on different profiles of an investor's willingness to accept investment risk.

AIC and its variable insurance company affiliate are under no obligation to continue the Program, or any asset allocation program, and have the right to terminate or change such services at any time.

#### Asset Allocation Program Models

Information concerning the current Asset Allocation Models is described on the following chart. You should review this information carefully before selecting or changing a Model.

<b><u>Investor Profile</u></b>				
<b>Conservative</b>	<b>Moderate</b>	<b>Balanced</b>	<b>Capital Growth</b>	<b>Aggressive</b>
You are looking for a relatively stable investment and require investments that generate some level of income.	Your focus is on keeping pace with inflation. Income generating investment and capital appreciation are desired.	You want the opportunity for long-term moderate growth and don't need current income.	You want an investment with good growth potential and don't need current income. You are willing to accept above average volatility.	You are an aggressive investor and can tolerate substantial volatility in exchange for potential higher long-term returns.
<b>Shorter Investment Horizon</b> ◀──▶ <b>Longer Investment Horizon</b>				
<b>Investor Objective</b>				
Primarily Preservation of Capital	Moderate Growth	Steady Growth in Asset Values	Moderately High Growth in Asset Values	High growth in asset values
<b>Risk Characteristics</b>				
<b>Lower Risk</b> ◀──▶ <b>Higher Risk</b>				

#### Selecting an Asset Allocation Model

You need to determine which Asset Allocation Model is best for your circumstances. We will not make this decision for you. By electing certain variable annuity riders you will have fewer Asset Allocation Models from which you can choose. You should periodically review these factors to determine if you should change Models to keep up with changes in your personal circumstances.

The registered representative can assist you in completing the proper forms to subscribe to the Asset Allocation Program or to change to a different Model. You may use analytical tools made available by AIC, including an investor profile questionnaire, which asks questions intended to help you assess your financial needs, investment time horizon, and willingness to accept investment risk. The questionnaire can be an aid, but neither it nor AIC will make the decision for you. It is your decision to select a Model or to change to a different Model. AIC bears NO responsibility for this decision. You must allocate all of your policy to one asset allocation model. We must receive notice of your asset allocation model election by Written Notice, as defined in the relevant Variable Product prospectus, before we can begin a program for you.

You may change to a different Model at any time with a proper written request or by telephone or electronic instructions, as long as a valid telephone/electronic authorization is on file with AIC. While AIC is a registered broker/dealer with registered representatives, you should understand that the registered representative who will assist you with this program may NOT BE a registered representative with AIC but rather a registered representative with a broker/dealer who has no affiliation or relationship with AIC.

### **Modified Asset Allocation Program**

Certain variable annuities include riders that, if elected, would require you to participate in a modified Asset Allocation Program. Modifications include a fewer number of allowable asset allocation models, and the potential for models to be discontinued for use with the rider following advance notice to you. While AIC offers this asset allocation service at no additional charge, you will pay the fee associated with the variable annuity rider.

If you are currently participating in a model and you make changes outside the model, you will not receive future notifications of model changes. You will then be considered as having withdrawn from the Program and as having cancelled your relationship with AIC for purposes of implementing the Program with your Policy. For this reason, you will not be able to execute trades online if you participate in the Program. You will be required to communicate with the Service Center if you wish to make a transfer or trade. The Service Center will communicate that your election to execute a trade will result in the discontinuance of the Program for your Policy prior to you being able to execute any telephone transaction.

### **Risks**

Although the Models are designed to help optimize returns given the various levels of risk, there is no assurance that a Model will not lose money or that investment results will not experience volatility. Investment performance of your account value could be better or worse by participating in an Asset Allocation Model than if you had not participated. A Model may perform better or worse than any single investment option or asset class or other combinations of investment options or asset classes. Model performance is dependent upon the performance of the component investment options. The timing of your investment and the automatic quarterly rebalancing may affect performance. Your account value will fluctuate and may be worth more or less than premiums paid.

An Asset Allocation Model may not perform as intended. Although the Models are intended to optimize returns given various levels of risk tolerance, portfolio, market and asset class performance may differ in the future from the historical performance and assumptions upon which the Models are based, which could cause the Models to be ineffective or less effective in reducing volatility.

Periodic updating of the Asset Allocation Models can cause the underlying Portfolios to incur transactional expenses to raise cash for money flowing out of the Portfolios or to buy securities with money flowing into the Portfolios. These expenses can adversely affect performance of the pertinent Portfolios and the Models.

If participation in the Program terminates, including by your death, Policy value will not be reallocated automatically if the model is changed. Thus, it will not reflect the most current allocation recommendations. Any additional premiums received after your death will be returned.

### **Reviews and Reports**

Participants in the Asset Allocation Program will be sent a quarterly report that provides information about the investments in the Models. Information regarding performance of the Models will be available on our website.

### **Fees**

We do not charge you a fee for use of the Asset Allocation Program. You will pay fees and expenses under the terms of your Variable Products. For information regarding those fees and expenses, see the prospectus that describes the pertinent Variable Product. You will also indirectly bear the expenses of the Portfolios to which your account value is allocated. The net asset value of the Portfolios

reflects the investment management fees and other expenses that are deducted from the assets of the Portfolio. The management fees and other expenses of the underlying portfolios are not fixed or specified under the terms of the Variable Products, and they may vary. The fees and expenses for Portfolios are described in its prospectus.

### **Fee Schedule**

We do not charge you a fee to participate in the Asset Allocation Program. Therefore, a Fee Schedule does not apply to this particular program. You will pay the fees and expenses associated with your Variable Product.

## **ACCOUNT REQUIREMENTS AND TYPE OF CLIENTS**

If you subscribe to the Asset Allocation Program, you must give your written consent and discretionary authority to AIC. You must select one of the Asset Allocation Models. Thereafter, the initial Variable Product payment (in the case of a new application) or account value, as applicable, will be allocated to the investment options according to the Model selected by you. Subsequent Variable Product payments, if allowed under the applicable Variable Product, will also be allocated accordingly, unless you instruct AIC otherwise in writing. Account values will be rebalanced quarterly to maintain the current allocations of the Asset Allocation Model, since changes in the net asset values of the underlying investment options in each Model will alter your asset allocation over time. If you allocate a part of the Variable Product payment or account value to a Portfolio that is not within the Models, this advisory relationship terminates and the Models will no longer be updated for you. If you allocate to a Model that is not allowed pursuant to the terms of a rider you elected, both the advisor relationship and the rider will terminate.

### **Types of Clients**

The Asset Allocation Program is available to policyholders of Ameritas Variable Products.

## **PORTFOLIO MANAGER SELECTION AND EVALUATION**

AIC offers asset allocation models, each based on different profiles of an investor's willingness to accept risk, through the Asset Allocation Program. The models were developed with the assistance and recommendations from an unaffiliated third party investment advisor. There are currently five Asset Allocation Models, each comprised of a combination of investment options available through the Variable Products.

The unaffiliated third party investment advisor takes a broad-based view of asset allocation, with investments generally falling into one of four asset categories: global equity, global fixed income, real assets and diversifying strategies. Each category serves a specific role within a portfolio. An allocation to all four categories provides diversification to major market risk factors and provides a high-level framework to view the exposures within the portfolio. In order to achieve an even greater level of diversification, the four broad categories are further broken down into sub-categories with more specific risk/reward characteristics and market behavior. By strategically allocating portfolios among these categories, the unaffiliated third party investment advisor seeks to generate consistent returns and manage risk irrespective of the market environment. The unaffiliated third party investment advisor matches investment objectives for each portfolio. The investment objectives define strategic allocation profiles targeting the risk and return characteristics, as well as performance benchmarks.

The unaffiliated third party investment advisor believes investment firms that meet their quality threshold on organization structure, personnel, investment philosophy, and performance must also demonstrate key attributes of conviction, consistency, investment culture, risk control, and active return.

- Conviction: Strong belief in the investment philosophy; willing to put investment decisions ahead of business decisions; invests alongside of clients, aligning interests
- Consistency: Stability of organization structure, composition of the investment professionals, and the investment philosophy and process
- Investment Culture: Strong ethical foundation; passionate about investing; proper organizational and compensation structure; culture pervades across organization
- Risk Control: Not blind risk takers, but risk conscious; acknowledges mistakes; robust and effective risk mitigation
- Active Return: Ability to identify and profit from investment opportunities; successful track record

The unaffiliated third party investment advisor evaluates managers through these tenets and further considers each investment strategy's contribution to a portfolio. As such, the unaffiliated third party investment advisor does not evaluate purely on historical performance, but instead on investment options that contribute positively to portfolio opportunities and risk.

Each Portfolio is offered by a registered open-end investment company ("Fund") whose funds are sold exclusively to insurance companies and retirement plans. Each Fund is managed by an investment manager who may retain other Portfolio managers, or sub-advisers. Funds are managed in a variety of investment strategies and may invest in various types of securities depending on their investment strategy, including, among others, U.S. and non-U.S. equity, and fixed income securities. Funds may be added to or eliminated from the Variable Products in the future at the discretion of Ameritas Life. Information regarding the Funds and their investment strategies is available in that Fund's prospectus. For more complete information on each Fund, including a discussion of the Fund's investment techniques and the risks associated with its investments, see the applicable Fund prospectus. No assurance can be given that a Fund will achieve its investment objective. You should read each Fund's prospectus carefully before investing.

Each of the Asset Allocation Models are evaluated periodically by our third party financial advisor, to assess whether the combination of the investment options within each Model should be changed to better seek to optimize the potential return for the level of risk tolerance intended for the Model. As a result, each Model may change and investment options may be added to a Model, including investment options not currently available, or investment options may be deleted from a Model.

When the Asset Allocation Models are updated, AIC will automatically reallocate your policy value (and subsequent Variable Product payments, if applicable) in accordance with any changes to the Model. This means the allocation of your Variable Product policy value, and potentially the investment options in which you are invested, will automatically change, and your policy value (and subsequent Variable Product payments, if applicable) will be automatically reallocated among the investment options in the updated Model. In order to participate in the Asset Allocation Program, you are required to grant AIC discretionary investment authority only for the purpose of modifying the models and to reallocate periodically your account value (and subsequent Variable Product payments, if applicable) in accordance with the updated version of the Asset Allocation Model selected.

When the Asset Allocation Models are updated, AIC will send you written notice of the updated Models at least 30 days in advance of the date on which AIC intends the updated version of the Model to be effective. You should carefully review these notices. If you wish to accept the changes in your selected Model, you will not need to take any action, as your account value (and any subsequent Variable Product payments, if applicable) will be reallocated in accordance with the updated Model automatically. If you do not wish to accept the changes to the selected Model, you can change to a different Model or withdraw from the Program.

You may be required to participate in a modified Asset Allocation Program if you elect certain variable annuity riders.

If Ameritas Life determines, in its sole discretion, to discontinue access to an allocation Model available pursuant to such rider, AIC will automatically reallocate your account value (and subsequent Variable Product payments, if applicable) to a default model based on discretionary authority that you granted to AIC for the purpose of deletions of Models. In order to elect such riders, you are required to grant AIC discretionary investment authority for the purpose of deletions of Models.

Although the Asset Allocation Program is intended to mitigate investment risk, there is a risk that investing pursuant to a model will still lose value. For information about the risks of participating in the Program and more detail about the Program, including more information about conflicts of interest, ask for a copy of the variable product prospectus. More information about AIC's role as investment advisor for the Program is available on AIC's Form ADV Part 2A which is available at your request. We may modify or discontinue the Asset Allocation Program at anytime.

## **CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

We will only share your information within Ameritas as permitted by law. We do not share non-experience information (as defined by the Fair Credit Reporting Act) within Ameritas or with third parties.

### **Information Provided to Agent and Brokers**

We may share your information with your agent or broker so that they may provide you with efficient and superior service. Your agents and brokers understand the importance of your privacy and they are required by law to maintain your privacy and safeguard your information. We require our agents and brokers to follow our policies in order to keep your personal information private and secure. You may not opt-out of these disclosures.

### **Within Ameritas**

We may use and share your information within Ameritas so that we can:

- Provide you with superior customer service;
- Design new products;

- Efficiently service your products;
- Make improvements to the products we offer you; and
- Offer you other products and services that may benefit you.

### Outside Ameritas

We do not sell or share your information with outside marketers. We may share your information outside of Ameritas for the following reasons:

**Service Providers:** We may share information about you with service providers. Service providers are unrelated companies who perform business transactions for us. We require service providers to keep your information confidential. We prohibit them from using your information for their own purposes or re-disclosing it to anyone. Disclosures to service providers are a part of our business operations. You may not opt-out of these disclosures.

**Required by Law:** Sometimes the law requires us to share customer information such as in response to a valid summons, court order, search warrant or subpoena. We must comply with the law and therefore you may not opt-out of these disclosures.

## CLIENT CONTACT WITH PORTFOLIO MANAGERS

You may contact AIC or Ameritas Life with questions concerning the Portfolios. These are not retail Portfolios and are available only through variable accounts of insurance companies.

## ADDITIONAL INFORMATION

### Disciplinary Information

AIC currently has the following material legal or disciplinary events to disclose. Materiality is subject to AIC's discretion, and/or as defined by the SEC for purposes of this disclosure document. The following items are presumed to be material by the SEC for purposes of this Item. If there are additional legal or disciplinary events that are material to your evaluation of AIC's advisory business or the integrity of the management of AIC's advisory business, AIC will disclose all material facts regarding those events.

AIC is a federally registered investment adviser and broker dealer. All of the events disclosed below derive from its operations as a broker dealer.

#### The following items are being disclosed by AIC:

1. In October of 2016, the Financial Industry Regulatory Authority censured and fined AIC \$50,000 for allegedly failing to maintain a sufficient supervisory system to monitor requests from representatives to change customer addresses of record and to disburse funds to a customer's new address. In November 2008, one of AIC's representatives asked the firm to change a customer's address of record to the representative's business address. Simultaneously, the representative asked that the firm disburse funds from the client's account to the new address of record. In accordance with securities laws and regulations, AIC notified the client of the address change by mailing a letter to the client's old address of record. The representative misappropriated the client's funds through disbursements. The client did not authorize either the address change or the disbursement of funds. AIC detected the improper activity in June 2014, at which time AIC immediately terminated the representative, reimbursed the customer's losses in full, and modified policies governing customer address changes, prior to entering into a settlement with FINRA.
2. In October of 2015, the Financial Industry Regulatory Authority censured and fined AIC \$150,000 for allegedly failing to apply sales charge discounts to certain customers' eligible purchases of Unit Investment Trusts ("UITs") in violation of FINRA Rule 2010, and for allegedly failing to establish, maintain, and enforce a supervisory system and written supervisory procedures designed to ensure customers received sales charge discounts on eligible UIT purchases in violation of NASD Conduct Rule 3010 and FINRA Rule 2010. Prior to entering into a settlement with FINRA, AIC voluntarily paid restitution to all affected clients in the aggregate amount of \$128,544.
3. In September of 2015, the Securities and Exchange Commission announced that AIC agreed to a settlement of allegations pursuant to the Commission's Municipal Continuing Disclosure Cooperation ("MCDC") Initiative that, in connection with AIC's underwriting of certain municipal securities offerings, it willfully violated Section 17(a)(2) of the Securities Act of 1933. AIC agreed and consented to: (A) cease and desist from committing or causing any violations of Section 17(a)(2) of the Securities Act, (B) pay a civil money penalty in the amount of \$200,000, and (C) comply with certain undertakings. The MCDC was a voluntary initiative in which the SEC encouraged municipal issuers and underwriters to self-report violations involving materially inaccurate statements relating to prior compliance with the continuing disclosure obligations specified in Rule 15c2-12 of the Securities Exchange Act of 1934.



4. In March of 2015, the State of New Jersey found an Ameritas Life agent to have sold, solicited, and/or negotiated Ameritas insurance products in an unfair, deceptive, misleading, and/or fraudulent manner, and that Ameritas Life Insurance Corp. assisted and/or facilitated those acts. As a result of the finding, Ameritas Life Insurance Corp. has stated that they shall offer penalty-free rescissions and full refunds of all payments and premium including any withdrawal charges and other payments or fees paid on all policies and contracts identified in the order.
5. In April of 2014, the State of Iowa Insurance Division fined AIC \$10,000 for allegedly selling unsuitable non-exchange traded limited partnership investments, and failure to reasonably supervise the activities of the registered representative selling that product.
6. In December of 2010, the State of South Dakota, Department of Revenue and Regulation, Division of Securities fined AIC \$10,000 for allegedly employing home office suitability principals at certain times between May 2007 - November 2008 who were not registered in South Dakota.
7. In March of 2010, the State of South Dakota, Department of Revenue and Regulation fined AIC \$5,000 for failure to deliver securities in the form of a variable life insurance policy to client on a timely basis and failure to supervise the representatives responsible for the delivery of said policy.
8. In March of 2009, the Financial Industry Regulatory Authority censured and fined AIC \$100,000 for allegedly using communications with the public, through a registered representative, in the form of written financial plans that failed to provide a sound basis for evaluating the products being recommended, contained misleading statements and omitted material information, including risks. AIC allegedly failed to take sufficient action to ensure the registered representative was not using the plans until the plans were approved by a registered principal at the firm prior to use with customers, and failed to file the communications with FINRA. In addition, AIC allegedly failed reasonably to supervise the activities of the registered representative. The registered representative allegedly provided financial plans to the public that contained misleading statements and omitted material information including risks. The representative also allegedly sold products to customers that were unsuitable based on their financial situation and needs, and without AIC's knowledge recommended that customers use mortgage proceeds to fund securities transactions.
9. In August of 2008, the State of Nebraska, Department of Banking and Finance fined AIC \$10,000, as well as the cost of the investigation (\$1,000) for failure to disclose in Section 13 of Form U4, certain representatives affiliation with Central Financial Services, and for failure to place certain required disclosures on a single newspaper advertisement following proper submission and review.
10. In September of 2007, the State of Florida, Office of Financial Regulation fined AIC \$65,000 for failure to supervise two individuals in Florida concerning seminar activities, email address approval and retention, disclosure of outside business activities, and updating the Form U-4 on employment history. AIC was also asked to retain a private consultant to review procedures within 45 days, and to have that review complete within 120 days, and to forward that review to the State of Florida.

### **Other Financial Industry Activities**

We are both a registered broker/dealer and an Investment Adviser with the Securities Exchange Commission. AIC is also a licensed insurance agency with various states. Many of AIC's management persons are registered representatives. IARs are also registered representatives of AIC and may be individually licensed as insurance agents.

Neither AIC nor AIC's management persons are currently registered as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

We are one of a family of companies affiliated with Ameritas Life, whose ultimate parent is Ameritas Mutual Holding Company ("Ameritas").

AIC serves as the principal underwriter of variable insurance products issued by Ameritas Life and Ameritas Life of NY. AIC's parent and affiliates are engaged in diversified financial services. Certain of these companies and other affiliated companies are broker/dealers, investment companies, investment advisers, and insurance companies.

We may recommend to clients the purchase of variable insurance contracts issued by Ameritas Life, for which we are the underwriter and a distributor. These variable insurance contracts are funded by separate accounts of the insurance company, certain of which in turn invest in shares of Calvert Variable Products, Inc. Funds ("Calvert VP Funds") or Calvert Variable Series, Inc. Funds ("Calvert Funds"). AIC is an affiliate of Ameritas Life, AIP, Calvert Funds, and Calvert VP Funds, and also is an affiliate of Calvert Investment Management, Inc. (CIM), an investment adviser that manages Calvert VP Funds. AIP is the sub-adviser for certain Calvert VP Funds and Calvert Funds.

AIC may be subject to competing interests that have the potential to influence its decision making with regard to the Asset Allocation Program. AIC is compensated by Ameritas Life as principal underwriter for the Variable Products. Ameritas Life may receive fees for administrative services from funds in the Models or distribution fees. Calvert Investments, Inc. is the parent of Calvert Investment

Management, Inc. (CIM). CIM is an investment advisor registered under the Investment Advisors Act of 1940, as amended. CIM provides investment advice to certain investment companies in the Calvert Investments, Inc. mutual funds. Investments in the Calvert family of funds, including Calvert Variable Series, Inc. ("Calvert Funds") Calvert Variable Products, Inc. ("Calvert VP Funds") are underwritten by Calvert Investment Distributors, Inc., a fully registered broker/dealer and subsidiary of Calvert Investments, Inc. The Calvert VP Funds and Calvert Funds series have funds offered through the Variable Products and in the Models. Certain of the Calvert Funds and Calvert VP Funds are sub-advised by Ameritas Investment Partners, Inc. AIP, also a federally registered investment adviser, is the adviser to its affiliated insurance companies for general account investments. CIM and AIP are compensated for management oversight, sub-advisory, and administrative services. To address these potential conflicts of interest, AIC and Ameritas Life have engaged an independent financial advisor to design the models and select the investment options in the Models.

All officers and other related persons are required to ensure that AIC receives duplicate confirmations on all securities transactions (involving stocks and bonds) by the related person. The Compliance Officer, or his/her designee, will be responsible for review of duplicate confirmations and exception reports.

We provide brokerage services and AIP provides investment advisory services to those AIC clients who establish Private Clients and related program accounts (Private Clients). These related accounts may include those in the Gemini and Mercury Programs. AIP shares with us the fees generated by each AIP Private Clients account sold or processed through our clearing relationships.

We maintain agreements with AIP. In the Constellation program, AIP provides certain advisory services to us. In the Gemini and Mercury programs, AIP provides, on a discretionary basis, professional account management services.

We have multiple channels of distribution. Independent producers seeking to affiliate with a broker dealer may become registered with us, if properly qualified. Most of our Registered Representatives and IARs are licensed/appointed as life insurance agents of Ameritas Life and Ameritas Life of NY. If acting as an insurance agent, an AIC associate is authorized to sell only those insurance products issued, distributed, or otherwise authorized by the respective insurance company. Our IARs may recommend that a client purchase certain insurance products. Our associates may receive commissions for the sale of insurance products. Commissions for the sale of insurance products would be in addition to any compensation that our associates receive in providing investment advisory services, and may be an incentive for the associate to recommend these products. If our associates are acting as independent insurance agents, they are not precluded from offering a life insurance product from an unaffiliated life insurance company.

We retain net profits that result from the correction of trade errors in program accounts. All losses incurred by clients, due to error, will be removed from either the representative's commissions or the house, depending on the cause of error.

AIC, from time to time, participates as a member of a selling group in connection with the offering of municipal or other securities. AIC clients may be advised to purchase securities in an underwriting in which AIC is a selling group member. Under these or similar circumstances, AIC clients will be advised that AIC and/or its affiliate are acting in dual capacities in connection with such recommendation. In addition, in the context of AIP Private Clients and related program accounts, the consent of the client will be obtained before any recommendation is implemented on the client's behalf.

AIC and/or its affiliated companies may, from time to time, participate as an investor in partnerships that invest in mortgage-related securities. AIC clients may be advised to purchase interests in such partnerships.

We do not normally act as a dealer in connection with securities that we recommend to our clients other than in the context of underwritings, as described above. AIC may act as principal in securities transactions with advisory clients for the purpose of making such securities available to AIC advisory clients; subsequent sales to AIC clients will be effected only with the clients' prior written consent and in accordance with all applicable regulations, including mark-up limitations with respect to "riskless principal" transactions. AIC has adopted procedures that permit AIC to act as principal in other securities transactions with its advisory clients, provided that the consent of the client is obtained in advance of the transaction. In addition, IARs may purchase or own variable insurance products issued by Ameritas Life or Ameritas Life of NY that are also recommended to AIC clients or securities products underwritten by AIC. AIC may act as a broker in an agency cross transaction for an advisory Client.

As part of a financial planning arrangement, AIC may also offer advice regarding interests in partnerships including those investing in equipment leasing, real estate, oil and gas, structured products and cable television. AIC IARs will not normally collect an ongoing fee on these investments, although exceptions may be made.

We may also advise our clients with respect to interests in partnerships that invest in mortgage-related securities as well as other investments, as noted. AIC or its affiliate may participate as investors in partnerships that are designed for institutions. As noted above, AIC participates in a variety of proprietary and third party asset management programs. The mutual funds and other

investment vehicles in these accounts may be authorized to invest in securities of foreign issuers, futures contracts, options on futures contracts, and other securities to the extent disclosed in the prospectuses relating to each such vehicle.

AIC will disclose all material conflicts of interest so that existing and prospective clients may evaluate their impact on any relationship.

## **Code of Ethics Summary**

AIC has adopted a Code of Ethics to: address its fiduciary relationship and its investment advisory supervised persons' fiduciary relationship with their clients; specify or prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or appearance of), and establish reporting requirements and enforcement procedures under federal, state and all other applicable securities laws.

In recognition of the trust and confidence placed in AIC by its clients and to stress AIC's belief that its operations are directed to the benefit of its clients, AIC has developed and adopted the following general principles to guide its employees, officers, and directors deemed to be Supervised Persons of AIC's RIA ("RIA Supervised Persons") under the Code of Ethics. AIC defines AIC, the Investment Advisor, to be the entity that supports and drives the sale of investment advisory products and services. This includes all investment advisory supervised persons which is defined as key officers, home office associates, all IARs and all associates of an IAR's office, including licensed and non-registered fingerprinted people.

1. The interests of the clients are paramount and all RIA Supervised Persons shall strive to conduct themselves in such a manner that the interests of the clients take precedence over all others, and to prevent access to non-public information about AIC's securities recommendations, and client securities holdings and transactions, except to those associates that need such information to perform their duties.
  - A. All personal securities transactions by RIA Supervised Persons must be accomplished in such a way as to avoid any conflict between the interest of AIC's clients and the interest of any Supervised Persons.
  - B. All RIA Supervised Persons shall strive to avoid actions or activities that allow personal benefit or profit from their position with regard to AIC's clients.
  - C. No RIA Supervised Persons shall, in connection with the purchase or sale of securities, directly or indirectly:
    - Employ any device, scheme or artifice to defraud;
    - Make any untrue statement of a material fact or omit to state a material fact;
    - Engage in any act, practice or course of business which would operate as a fraud or deceit; or
    - Engage in any manipulative practice.
2. Each RIA Supervised Person shall report to AIC's Chief Compliance Officer (CCO), or his/her designee, all transactions in securities in which the person has, or by reason of such transaction acquires, any direct or indirect beneficial ownership.
3. Each RIA Supervised Person shall submit quarterly reports of personal securities transactions to AIC's CCO, or his/her designee, which shall be reviewed to determine whether a violation of the Code of Ethics may have occurred.
4. Each RIA Supervised Person shall submit appropriate holdings reports to AIC's CCO, or his/her designee, which shall be reviewed to determine whether a violation of the Code of Ethics may have occurred.
5. Each RIA Supervised Person shall report any violation of the Code of Ethics to the CCO, or his/her designee.
6. Each RIA Supervised Person shall submit written acknowledgement of receipt of the Code of Ethics and any amendments.
7. Responsibilities of RIA Supervised Persons under this Code of Ethics include those provisions outlined in the Section on Insider Trading in the Investment Advisor Manual.
8. Responsibilities of RIA Supervised Persons under this Code of Ethics include those provisions outlined in the Section on Gifts in the Investment Advisor Manual.

If you want to obtain a complete copy of AIC's Code of Ethics, we will provide it upon request.

## **Participation in Client Transactions and Additional Compensation Received**

Officers of AIC may, from time to time, make recommendations to our advisory clients relating to securities in which such officer has an interest. In addition, and as noted above, we are part of a family of companies engaged in the financial services and insurance industries. These companies, some of which may be regarded as "related persons" of ours, may have direct or indirect interests in securities about which we and/or our IARs may provide investment advice.

We, through our clearing relationships, have access to new issue offerings in fixed income securities, such as CDs and other products. If you accept a recommendation from us and your registered representative that a new issue fixed income product be purchased in your advisory program account, we will be paid the sales credit on the new issue offering in accordance with the terms of the

prospectus. The payment of such a sales credit neither increases nor decreases the price that you pay for that new issue security. Because we retain this credit, and because we may share this sales credit with your registered representative who may also be your investment advisor representative, a conflict of interest exists, for two reasons. This is because we earn this sales credit and may charge you an advisory fee on the market value of these fixed income securities. On average, such sales credits are approximately 5% of the offering price that you paid for the securities, but some may be higher or lower. Please ensure that you read the prospectus before you invest.

We may buy or sell for our accounts, or individuals associated with us may buy or sell for their personal accounts, securities identical to those recommended to customers.

Because AIC or any related person(s) may have an interest or position in a certain security which may also be recommended to you, our client, and as these situations may present a conflict of interest, we have established the following restrictions in order to ensure our fiduciary responsibilities:

1. A director, officer or employee of AIC shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No person of AIC shall prefer his or her own interest to that of the advisory client.
2. All clients are fully informed that employees of AIC may receive separate compensation when effecting transactions during the implementation process.
3. AIC emphasizes the unrestricted right of the client to decline to implement any advice rendered.
4. AIC emphasizes the unrestricted right of the client to select and choose any broker or dealer and/or insurance company he or she wishes.
5. AIC requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisers.

Any individual not in observance of the above may be subject to termination.

### **Review of Accounts**

Clients who elect to participate in the Asset Allocation Program will receive written quarterly statements reflecting the automatic rebalancing of values within their policies. In addition, clients will receive monthly written statements for each month in which activity occurs in their policy.

On a monthly basis, AIC and its affiliate insurance company prepare a report to review for policies that have elected a model, but whose policies have not been rebalanced in accordance with a model.

### **Client Referrals and Other Compensation**

There are no client referrals or other compensation for the Asset Allocation Program.

### **Financial Information**

AIC is deemed to have limited discretionary authority in the Asset Allocation Program. We will disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to you. At this time, we have no financial conditions that would impair our ability to meet contractual commitments to you.

## **IMPORTANT PRIVACY CHOICES**

### **IMPORTANT PRIVACY CHOICES**

This Notice is provided jointly on behalf of the Ameritas Investment Corp. and the individual variable life insurance and annuities businesses of: Ameritas Life Insurance Corp. and Ameritas Life Insurance Corp. of New York.

#### **Our Privacy Commitment to You**

We value your trust. That is why we are committed to protecting your personal information. This Notice explains the way we use and protect your personal information. You do not need to take any action, but you do have certain rights that are described in this Notice.

**Ameritas**

In addition to those companies listed above, Ameritas consists of the following affiliated companies, all of which offer their own Notice of Privacy of Information Practices:

Calvert Investments, Inc.

Ameritas Investment Partners, Inc.

### **Information We Collect**

We collect information about you for the purpose of conducting routine business functions such as:

- Opening and servicing your accounts; and
- Providing you with excellent customer service.

Following are examples of the types of customer information we may collect about you:

#### **Personal identification and contact information such as your:**

- Name, address and telephone number;
- Social Security number; and
- Date of birth.

#### **Financial information such as your:**

- Assets;
- Income; and in some cases
- Credit history.

**Health or Medical Information:** We do not collect or maintain medical information about our investment customers.

### **How We Gather Your Personal Information**

Most of the information we collect about you comes directly from you. You give us personal information when you apply for our products and services. We also may receive information from:

- Your agent or broker who helps you initiate and service your account;
- Governmental agencies; and
- Independent reporting agencies.

### **How We Use and Share Your Personal Information**

#### **Within Ameritas**

We may use and share your information within Ameritas so that we can:

- Provide you with superior customer service;
- Design new products;
- Efficiently service your products;
- Make improvements to the products we offer you; and
- Offer you other products and services that may benefit you.

We will only share your information within Ameritas as permitted by law. We do not share non-experience information (as defined by the Fair Credit Reporting Act) within Ameritas or with third parties.

#### **Outside Ameritas**

We do not sell or share your information with outside marketers. However, we may share your information outside of Ameritas for the following reasons:

***Service Providers.*** We may share information about you with service providers. Service providers are unrelated companies who perform business transactions for us. We require service providers to keep your information confidential. We prohibit them from using your information for their own purposes or re-disclosing it to anyone. Disclosures to service providers are a part of our business operations. You may not opt-out of these disclosures.

***Required by Law.*** Sometimes the law requires us to share customer information such as in response to a valid summons, court order, search warrant or subpoena. We must comply with the law and therefore you may not opt-out of these disclosures.

***Agents and Brokers.*** We may share your information with your agent or broker so that they may provide you with efficient and superior service. Your agents and brokers understand the importance of your privacy and they are required by law to maintain your privacy and safeguard your information. We require our agents and brokers to follow our policies in order to keep your personal information private

and secure. You may not opt-out of these disclosures.

### **Your Rights**

You have the right to receive a copy of this Notice at least once each year while you are our customer. This Notice is also available on our websites. You may request an additional copy by writing, e-mailing or calling Ameritas' Privacy Office as indicated at the end of this Notice.

You have the right to review the information that we have about you. You must make this request in writing and include your full name, address and policy or account number. We may charge you a reasonable fee for the copies you request.

You have the right to request that we make corrections to the information that we maintain about you if you believe that our records are incorrect. All requests must be in writing.

### **Limited Purpose Opt-Out**

From time to time registered representatives change their broker-dealer affiliation. In the event the registered representative who services your AIC account, your Ameritas variable life insurance policy or your variable annuity, leaves us to join another firm, unless you opt-out, we may allow your registered representative to forward your information to the new broker-dealer in order for your account to remain with the same registered representative. If you would prefer that we not allow your registered representative to forward your personal information to the new broker-dealer in this situation, you may opt-out by calling our automated opt-out line toll-free at 877-272-8474. This is a voice message only -- please leave your client ID or policy number, your name and phone number in case we need to contact you.

### **We Safeguard Your Personal Information**

We maintain physical and electronic safeguards for the protection of your personal information. We restrict access of your information to our employees and agents who need it to perform their jobs. Our employees and agents understand the importance of these safeguards. We have trained them in the proper handling of your personal information.

### **Former Customers' Personal Information**

The policies and practices described in this Notice apply equally to current and former customers. When you are no longer a customer, we will maintain your information for the period of time required by law and then it is destroyed. As a former customer, however, you will not receive our annual Privacy Notice.

### **Our Privacy Policies**

This Privacy Notice summarizes the Official Privacy Policy of Ameritas Investment Corp., which became effective on November 1, 2008. We are required by law to send you our Privacy Notice at least once each year. This Notice complies with all applicable laws and regulations. If your State's privacy law requires more restrictive practices than those described in this Notice, we will apply the more restrictive practices to your information. We may make changes to our Privacy Policies from time to time. However, if we make a change that impacts the accuracy of the sharing practices that are explained in this Notice, we will provide you with a revised Privacy Notice within thirty days.

You may contact us at:

Ameritas

Privacy Office

P.O. Box 81889

Lincoln, NE 68501-1889

1-888-284-7844

[privacy@ameritas.com](mailto:privacy@ameritas.com)

UN 1204 AIC Rev. 1-31-11