

Item 1 – Cover Page

OneAmerica Investment Advisory Services LLC

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March 31, 2020

This brochure provides information about the qualifications and business practices of OneAmerica Investment Advisory Services LLC (“OAIAS” or “Investment Adviser”). If you have any questions about the contents of this brochure, please contact us at (317) 285-1618. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

OAIAS is a registered investment adviser. Registration with the SEC as an investment adviser does not imply any level of skill or training.

Additional information about OAIAS also is available on the SEC’s website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a “CRD number.” OAIAS’s CRD number is 285390.

Item 2 – Material Changes

This Item of the Brochure will address only specific material changes that were made since the last update and provide clients with a summary of such changes. We last filed an update to our Brochure on March 29, 2019. There were no material changes to this Brochure from the previous versions.

Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of its business's fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting OneAmerica Investment Advisory Services LLC at (317) 285-1618.

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Item 4 – Advisory Business

Description of the advisory firm

OneAmerica Investment Advisory Services LLC (“OAIAS”), an Indiana limited liability company, was formed on August 3, 2016, with its principal place of business located in Indiana.

OAIAS is wholly owned by OneAmerica Financial Partners, Inc. (“OAFP”). OAFP is the managing member of OAIAS. OAFP is a wholly owned subsidiary of American United Mutual Insurance Holding Company (“AUMIHC”), which was formed under Indiana’s mutual insurance holding company statute. AUMIHC is the ultimate controlling entity and is a mutual insurance holding company without voting securities.

American United Life Insurance Company (“AUL”) is a life insurance corporation domiciled in the State of Indiana, and its principal business is the sale of life and disability insurance and annuity contracts. AUL is an affiliate of OAIAS. Through an Administrative Services Agreement, AUL will provide certain administrative services to OAIAS.

OneAmerica Retirement Services LLC (“OARS”) is an Indiana limited liability company formed on January 29, 2014 as a wholly owned subsidiary of OAFP for the purpose of providing recordkeeping and related services to retirement plans.

Through a Service Agreement, a Plan Sponsor will engage OARS to provide recordkeeping and other administrative services with respect to the employee benefit plan (“Plan”). AUL may offer insurance products to a Plan.

Assets Under Management (as of December 31, 2019)		
	U.S. Dollar Amount	Total Number of Accounts
Discretionary:	\$5,104,736,189	196
Non-Discretionary:	\$870,710,783	76
Total:	\$5,975,446,972	272

Types of advisory services

3(21) Services:

Through an Advisory Services Agreement, OAIAS will provide advisory services, as defined in Section 3(21) of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), to Plan Sponsors. A Plan Sponsor is the fiduciary, as defined in Section 402(a)(2) of ERISA.

Advisory Services Provided by OAIAS:

OAIAS shall assist the Plan Sponsor in the discharge of the Plan Sponsor’s duties with respect to the selection and monitoring of investment options under the Plan by providing the following services:

- Investment Option Selection
- Investment Option Selection Guidelines
- Investment Option Monitoring and Summaries
- Removal of Investment Options from the Suggested Fund List(s)

Due to the nature of the Advisory Services provided, OAIAS does not tailor its advisory services to the individual needs of the clients, nor does it accept restrictions on investing in certain securities or types of securities.

OAIAS will not provide tax or legal advice. Clients should consult with an expert on matters pertaining to tax or legal issues.

3(38) Services:

Through an Investment Manager Agreement, OAIAS shall serve as an Investment Manager, as defined in Section 3(38) of ERISA, for a Plan, with respect to the selection and monitoring of the investment options (“Investment Options”). A Plan Sponsor is the fiduciary, as defined in Section 402(a)(2) of ERISA) with respect to the Plan. OAIAS is not responsible for selecting, monitoring, or any other actions with respect to the Plan Sponsor Investment Options.

Investment Manager Services Provided by OAIAS:

OAIAS shall serve as an Investment Manager for the Plan with respect to the selection and monitoring of the Investment Options as described below. OAIAS is not responsible for selecting, monitoring, or any other actions with respect to the Plan Sponsor Investment Options. OAIAS shall provide the Plan Sponsor with the following Investment Manager Service:

- Investment Option Selection and Monitoring
- Changing of Investment Options

Due to the nature of the Investment Manager Services provided, OAIAS does not tailor its advisory services to the individual needs of the clients, nor does it accept restrictions on investing in certain securities or types of securities.

OAIAS will not provide tax or legal advice. Clients should consult with an expert on matters pertaining to tax or legal issues.

Item 5 – Fees and Compensation

The fee for any Advisory Service or Investment Management Service is negotiated based on the complexity of the client's particular situation and overall needs and the role taken by OAIAS, but typically will be up to 0.55% on the assets under advisement or assets under management.

Fees are generally paid quarterly in arrears. For purposes of determining fees, the value of the assets under management or under advisement is based on information provided by OARS or AUL as recordkeeper of the assets.

OAIAS retains the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These facts, circumstances and needs may include, among other factors, the complexity of the portfolio style; account composition; and reporting requirements. The specific annual fee schedule will be identified in the contract between OAIAS and each client.

A client may incur expenses from affiliate OARS relating to recordkeeping services. These fees will be up to 0.55% on the assets under administration based on the complexity of the services provided.

A client may also incur expenses relating to trustee and/or custodial services; however, such fees are not retained by OAIAS or any affiliate thereof.

OAIAS will not charge commissions. Please see Item 12 for more information.

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

OAIAS will not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

OAIAS will provide advisory services and Investment Manager services to client types that include, but are not limited to, the following:

- Retirement and pension plans
- Corporate pension and profit-sharing plans

OAIAS only offers its services to recordkeeping or administrative clients of its affiliate OARS.

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

Investing in securities involves risk of loss that clients should be prepared to bear.

OAIAS will employ different methods of analysis and investment strategies depending upon the advisory client and mandate.

Forms of Risk:

Mutual Fund Investing

Investments in mutual funds are subject to market risks such as absence of liquidity in markets or fluctuations in market prices beyond the control of the managers, resulting in investment objectives of the fund not being achieved.

Past Performance

Past performance of a particular fund is not indicative of the future performance of the fund.

Asset Allocation Models

While asset allocation models are believed to result in a diversified portfolio of investments, diversification does not protect against market risks and does not assume profit.

Risks for All Forms of Analysis

OAIAS's analysis methods rely on publicly available sources of information which are assumed to be accurate and unbiased data. While OAIAS is alert to indications that data may be incorrect, there is always a risk that OAIAS's analysis may be compromised by limited, inaccurate or misleading information.

Risk of Loss

Securities investments are not guaranteed, and clients may lose all invested funds.

Item 9 – Disciplinary Information

OAIAS has no reportable disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

The following individuals, who provide services on behalf of OAIAS and are involved in the activities of OAIAS as an investment adviser, are also registered representatives of OneAmerica Securities, Inc., an SEC registered broker-dealer that is wholly owned by AUL, a company under common ownership with OAIAS:

Terry W. Burns
Jeffrey S. Casper
Christine M. Faris
Kurt M. Mueller
Gregory W. Quick

OAIAS is a limited liability company and all employees listed above are also employees of AUL. With respect to the employees listed above, their job duties, in varying degrees, relate to OAIAS's business as an investment adviser.

Affiliate OARS offers recordkeeping and administrative services to clients and affiliate AUL offers certain insurance products to clients.

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

OAIAS has adopted a Code of Ethics (the “Code”) for supervised persons of the firm that includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at OAIAS must acknowledge the terms of the Code of Ethics annually.

OAIAS’ supervised persons are required to follow OAIAS’s Code of Ethics. The Code of Ethics is designed to provide assurances that the personal securities transactions, activities and interests of these persons will not interfere with making and implementing decisions in the best interest of advisory clients while, at the same time, allowing personnel to invest for their own accounts. In this regard, OAIAS permits its supervised persons to invest in the same securities as clients, which involves a potential conflict of interest, given that such persons may, in some circumstances, have the opportunity to trade their personal accounts in a manner designed to benefit inappropriately from market movements caused by client trading in the securities. The Code of Ethics has certain provisions designed to address this conflict of interest. Under the Code of Ethics, “access persons” of OAIAS (as described in the Code of Ethics) may not, except in certain circumstances, trade for their own accounts in securities which are being purchased or sold, or considered for purchase or sale, for OAIAS’ clients. In addition, the Code more broadly restricts trading by certain personnel in close proximity to client trading activity. Such trading is regularly monitored under the Code of Ethics. OAIAS’ clients or prospective clients may request a copy of the firm's Code of Ethics by contacting OAIAS’s Chief Compliance Officer at 317-285-1880.

Item 12 – Brokerage Practices

At this time, OAIAS will not be involved in transactional business, and consequently, OAIAS will not engage brokers in any transactional capacity.

Item 13 – Review of Accounts

OAIAS will have dedicated supervisors, as well as compliance, operational and internal audit staff, which monitor and provide oversight to the investment activities of supervised personnel. The supervisors, or their designees, review and monitor the activities OAIAS staff. Such activities include, but are not limited to, adhering to client guidelines and objectives, employee trading, investment product due diligence and marketing and advertising.

OAIAS will review the performance of the investment options under a Plan no less than annually for Advisory Services clients. Based on our mutually agreed upon service delivery schedule, OAIAS will provide a report summary of the period-end review to the Plan Sponsor. The review will contain market commentary on the previous quarter and a review of the available investment options. OAIAS will provide the review to Plan Sponsor at an agreed upon time frame. Plan Sponsor agrees to review, at least annually, the demographic of the Plan or other information

necessary to determine the appropriateness of the investment options chosen and make changes as necessary.

OAIAS will review the performance of the investment options under a Plan on a quarterly basis for Investment Manager services clients. Following the end of each calendar quarter, OAIAS shall provide a summary of its quarterly review to the Plan Sponsor. The quarterly review will contain market commentary on the previous quarter, a review of the investment options within the plan line-up and provide a watch list. Plan Sponsor agrees to review, at least annually, the demographic of the Plan or other information necessary to determine the appropriateness of the investment options chosen and make changes as necessary.

Item 14 – Client Referrals and Other Compensation

OAIAS will not pay fees or other compensation for referrals.

Item 15 – Custody

All clients of OAIAS will custody their assets to an outside custodian. Where applicable, clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. OAIAS urges investors to carefully review such statements and compare such official custodial records to the account statements that OAIAS may provide. OAIAS' statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Clients may engage OAIAS to provide discretionary or non-discretionary advisory services. Client give OAIAS discretionary authority when they sign an investment management agreement with OAIAS, and may, in certain circumstances, limit or change/amend such limitations by giving OAIAS written instructions.

Securities and/or tax laws, as well as internal compliance policies, may impose additional restrictions on the investments that may be made.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, OAIAS does not have any authority to and does not vote proxies on behalf of advisory clients. A Plan Sponsor retains the responsibility for receiving proxies from their custodian and voting proxies for any and all securities maintained in client portfolios.

Item 18 – Financial Information

OAIAS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.