

Compensation Disclosure in Connection with Single Premium Group Annuities (“SPGAs”)

USI Consulting Group (“USICG”) discloses the compensation that it receives in connection with SPGAs to its clients.

USICG will accept compensation for its services in placing, renewing, consulting on or servicing any SPGA only in the form of a specific commission based upon a percentage of premium from insurers and third party providers and/or a specific fee paid by clients for the placement of SPGAs.

USICG discloses such compensation to its clients, prior to binding, either in proposals from the insurers and third party providers or in written communications from USICG, and USICG receives the clients’ written consent.

The fee amount or commission percentage will be set at the time of each sale and will be included in the written disclosure provided to the plan sponsor or client. An authorized representative of the plan must agree in writing to the payment of the fee or commission prior to binding.

USICG may also receive from time to time customary, non-excessive meals and entertainment, and may receive reasonable education, training, or conference expenses.

USICG will not accept from or request of any insurer any form of contingent compensation. Contingent compensation is any compensation contingent upon USICG:

- a) placing a particular number of policies or dollar value of premium with the insurer;
- b) achieving a particular level of growth in the number of policies placed or dollar value of premium with the insurer;
- c) placing or keeping sufficient insurance business with the insurer to achieve a particular loss ratio or any other measure of profitability;
- d) providing preferential treatment in the placement process, including but not limited to the right of having a last look, first look, right of first refusal, or agreeing with an insurer to limit the number of quotes sought from insurers for insurance placements; and
- e) obtaining anything else of material value from the insurer other than customary, non-excessive meals or entertainment expenses and reasonable education, training or conference expenses.