

Mutual of Omaha Investor Services, Inc.

Conflicts of Interest Disclosure



Mutual of Omaha Investor Services, Inc. (“MOIS”) is registered as a broker-dealer with FINRA and as an investment adviser with the SEC. MOIS offers a wide variety of products and services, including mutual funds, exchange-traded securities (i.e., equities, exchange-traded funds, fixed income securities, etc.), variable insurance products, 529 plans, unit investment trusts, indexed annuities, retirement plans (i.e., 401(k) plans, 403(b) plans, 457 plans, etc.), fee-based investments, and financial planning services. MOIS registered representatives and/or investment adviser representatives (herein referred to as “Representatives”) transact securities business and provide advisory services to customers on behalf of MOIS.

Investments through MOIS are limited to products and services that have been approved by MOIS. Therefore, there may be products that are available outside of MOIS that are more appropriate based on your specific needs.

Along with every other financial services company, MOIS has conflicts of interest relating to the services we provide. Following is important information regarding potential conflicts of interest related to recommendations made by your MOIS Representative.

Compensation: Following are conflicts of interest relating to compensation received by MOIS and Representatives.

- MOIS and your Representative receive compensation from mutual fund companies and insurance companies (herein referred to as “Product Sponsor Companies”), including sales charges, trailing commissions and service fees (“12b-1” fees). Mutual fund and insurance product (including annuities) compensation typically varies by product sponsor company, creating a potential conflict of interest for your Representative to recommend a product with higher compensation. Please reference the fund prospectus for detailed information regarding the compensation for your mutual fund or insurance product investment.
- Mutual funds and variable annuities offer several different share classes or types, which represent different ways to pay sales charges. There is a potential conflict of interest relating to the recommendation of mutual funds or variable annuities as your Representative may earn additional compensation for a particular share class. Please reference the fund prospectus for detailed information regarding the sales charges associated with your mutual fund or variable annuity investment.
- Many mutual funds offer volume discounts to front-end sales charges (a.k.a., “breakpoints”) based on the amount invested in a particular mutual fund family. There is a potential conflict of interest relating to a recommendation for you to invest into multiple fund families, which may result in missed breakpoints and thereby additional compensation paid to your Representative. Please reference the product prospectus for detailed information regarding the sales charges associated with your mutual fund investment.

Securities and advisory services offered through Mutual of Omaha Investor Services, Inc., Member FINRA /SIPC.

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- There is a potential conflict of interest with respect to recommendations for retirement plan services through Mutual of Omaha Retirement Services as MOIS affiliate firm(s) may earn additional compensation for assets invested in such plans.
- Compensation (commission or advisory fees) may vary based on the retirement plan product. This may present a conflict of interest for your Representative to recommend a product with higher compensation. In addition, compensation for retirement plans are typically negotiable and may vary by plan. This may present a conflict of interest as the compensation you pay may differ than other plans sold by MOIS or your Representative.
- Compensation rates may vary based by Representative. This may present a conflict of interest for MOIS and field managers to refer customer leads to a Representative with a lower payout in order to retain a higher percentage of compensation.

Non-Cash Compensation: In addition to “direct” compensation, there may be conflicts of interest relating to indirect forms of “non-cash” compensation as described below.

- Product Sponsor Companies may make payments to MOIS to support and participate in various promotional activities, including but not limited to sales meetings, conferences and seminars held in the ordinary course of business. This may present a conflict of interest for MOIS to recommend sales of particular products that provide additional payments relating to promotional activities.
- Product Sponsor Companies may reimburse MOIS Representatives for expenses incurred in conjunction with sales and marketing efforts. This may present a conflict of interest for your Representative to recommend sales of particular products in exchange for receiving expense reimbursements.
- MOIS Representatives may receive non-cash compensation in the form of sales incentives and trips resulting from the sale of securities products through MOIS. This presents a conflict of interest for your Representative to recommend particular products or services rather than other products or services that could be more appropriate.
- Your Representative may receive non-cash compensation for the sale of retirement plans. Based on your Representative’s level of production, he/she may qualify for sales incentives and trips. Therefore, your Representative may have a conflict of interest to recommend retirement plans since they result in incentive pay.
- Your Representative may receive payments for providing customer leads to Mutual of Omaha Mortgage, an affiliate company, in the amount of \$250 per lead.

Revenue Sharing: MOIS has entered into revenue sharing arrangements with certain Product Sponsor Companies and retirement plan sponsors. In addition to sales charges, these companies make payments to MOIS based on the amount of new sales and/or the assets held. This may present a conflict of interest for MOIS to recommend sales of particular products to increase revenue earned through these arrangements. Please reference the MOIS Revenue Sharing Disclosure for details regarding these arrangements (www.mutualofomaha.com/investments).

Clearing Firm (Pershing, LLC): MOIS utilizes Pershing, LLC (“Pershing”) as the clearing firm to provide account custody and clearing services for brokerage accounts. Following are additional conflicts of interest related to MOIS brokerage accounts through Pershing.

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- MOIS has an arrangement with Pershing based on the number of assets held in custody with Pershing. At the end of each quarter, if MOIS does not meet a minimum revenue amount, MOIS is charged a specified fee as agreed upon with Pershing. This presents a conflict of interest for MOIS to recommend investments with Pershing rather than other investments that may be more appropriate.
- In Pershing brokerage accounts, MOIS offers cash sweep money market fund options. MOIS has a conflict of interest by offering money market sweep fund options that pay 12b-1 and service fees to MOIS and Pershing.
- Pershing brokerage accounts are subject to fees for certain activity, including a service fee charge (“ticket charge”) for each trade placed. MOIS receives a portion of the ticket charges for transactions in Pershing accounts.

Advisory Services: MOIS offers advisory services including financial planning services, third-party money manager relationships, and retirement account services. Conflicts of interest relating to advisory services are detailed in the MOIS Form ADV Part 2A Brochure, which can be found in the “Important Disclosure Information” section of the MOIS website (www.mutualofomaha.com/investments).