

**SECURITY BENEFIT – VARIFLEX LS**

**IRA CLIENT DISCLOSURE WORKSHEET**

OFG’S BUSINESS MODEL AND ASSOCIATED MATERIAL CONFLICTS OF INTEREST

OFG Financial Services, Inc. (“OFG”) is registered as a broker-dealer with the U.S. Securities and Exchange Commission (“SEC”) and with various states, offering retail securities brokerage services and engaging in the business of selling mutual funds, variable annuities, Section 529 College Savings Plans, and other general securities. OFG is a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). OFG also provides investment advisory services as a state-registered investment adviser.

OFG and its Representatives acknowledge we act as “fiduciaries” with respect to recommendations for Your IRA account. With the utmost care, prudence and diligence, we will attempt, in Your best interest, to provide You with an IRA investment product matching Your investment objectives, risk tolerance, and financial circumstances and needs, without regard to the financial or other interests of OFG or OFG’s Representatives.

However, OFG and its Representatives do receive commissions for broker-dealer transactions. This disclosure worksheet outlines the approximate fees/expenses that will be charged to Your account and the commissions that will be paid to OFG and your OFG Representative.

SCHEDULE OF TYPICAL ACCOUNT FEES AND SERVICE CHARGES

**SECURITY BENEFIT – VARIFLEX LS VARIABLE ANNUITY**

<b><u>Transaction Sales Charges and Broker-Dealer Commissions:</u></b>		
<u>Account Value</u>	<u>Initial Sales Charge from Security Benefit</u>	<u>OFG Commission</u>
Variable Account Assets *	None	1.30%
Fixed Account Assets *	None	1.30%
* Redemptions within 1 year are subject to a pro-rated commission charge-back to OFG.		
<b><u>Approximate Annual Fees/Expenses (varies by fund, see Your fund's prospectus for more details):</u></b>		
Annual Mortality & Expense Fee Deducted from Variable Assets by Security Benefit		1.25%
Annual Administrative Fee Deducted from Variable Assets by Security Benefit		0.15%
Annual Fund Investment Expenses Deducted from Variable Assets by Security Benefit		0.56% - 2.35%
Annual Investment Exp Deducted from Fixed Account Assets by Security Benefit		None
Portion of Above Expenses Paid as an Annual Ongoing Commission to OFG (After Year 1)		1.00%

Your OFG Representative will typically receive 70-75% of the OFG Commission amounts listed above.

DESCRIPTION OF OFG'S POLICIES AND PROCEDURES

OFG maintains policies and procedures relating to conflict-mitigation and incentive practices as required by applicable laws and regulations, including the U.S. Department of Labor's Fiduciary Rule. These policies and procedures require a commitment to the highest ethical standards and placing customers' best interests first. All OFG advisers have a duty to know, understand and comply with these policies and procedures and are required to report any violation of such policies and procedures to OFG's Chief Compliance Officer. OFG will provide You a copy of such policies and procedures upon request and without charge. You can request a copy from your OFG adviser.

Other than the commissions outlined in the table above, OFG does not receive any other third party payments with respect to this investment.

OFG'S COMPENSATION AND INCENTIVE ARRANGEMENTS WITH ITS REPRESENTATIVES

OFG's Representatives work on a commission-only basis, and typically receive 70-75% of the gross commission received by OFG. The compensation structure consists of these base commissions and other incentive opportunities for performance to various standards. A Representative's commission generally depends on the services and products being provided.

ATTESTATION: I attest to receiving this disclosure form and discussing it with my OFG Representative.

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CLIENT SIGNATURE

\_\_\_\_\_  
CLIENT NAME

\_\_\_\_\_  
OFG REPRESENTATIVE SIGNATURE

\_\_\_\_\_  
OFG REPRESENTATIVE NAME