

PEACE, Inc.
EEO/Personnel Committee Minutes
June 2, 2022 (via teleconference)

MEMBERS ON CALL: Edward Perry, Jason Wallace, DJ Williams

MEMBERS ABSENT: Pastor Phyllis Lee-Williams, Tonia Thornton

STAFF PRESENT: Carolyn Brown, Catherine Green Harris, Davona Lynch

GUESTS ON CALL: Mutual of America representatives Ed Wallace, Mattias Schuster, and Michael Morgante

CALL TO ORDER – 5:00pm:

The meeting was called to order by Jason Wallace, noting that a quorum of the committee was participating.

APPROVAL OF MINUTES:

A motion to approve the minutes of the February committee meeting was made by Mr. Perry, seconded by Mr. Williams and approved unanimously.

NEW BUSINESS:

The representatives from Mutual of America distributed and presented the annual 401(k) Plan Performance Review, which covered analyses of assets, fees and expenses, and demographics of plan participants.

APPLICANT POOL REPORT:

The committee reviewed and discussed the summary of hires and vacancies for May.

OLD BUSINESS:

Ms. Harris updated the committee about an ongoing human rights claim by a former employee.

Ms. Brown reminded the committee that the annual Board meeting is scheduled for June 27th at 4:00pm at Dinosaur BBQ.

ADJOURNMENT:

A motion to adjourn the June committee meeting was made by Mr. Williams, seconded by Mr. Perry and approved unanimously. The meeting was adjourned at 5:12pm.

PEACE, INC.
M E M O R A N D U M

TO: Head Start Policy Council / EEO Personnel Committee
FROM: Human Resources Department
SUBJECT: Open Positions
DATE: June 1, 2022

The following is a list of all currently approved open positions within PEACE, Inc.:

Child Behavior Specialist, HS/EHS - Sumner
UPK Teacher, Head Start - Merrick
Teacher, Head Start - Sumner (2)
Teacher, Head Start - Genesee
Teacher, Head Start - Liverpool
Teacher, Head Start - Merrick
Teacher, Early Head Start - Sumner (2)
Teacher, Early Head Start - Merrick
Home Visitor, HS/EHS - Genesee (3)
Family Worker, Head Start - SCSD Dr. King
Family Worker, Head Start - Vincent House
Family Worker, Head Start - Atonement/Lydia's/Elmcrest
Family Worker, Head Start - Sumner
Family Worker, Head Start - Genesee
Family Worker, Head Start - Merrick (2)
Teacher Assistant-UPK, Head Start - James Street
Teacher Assistant, Head Start - Merrick
Teacher Assistant, Head Start - Sumner (3)
Teacher Assistant, Head Start - Baldwinsville
Teacher Aide, Early Head Start - Sumner (3)
Teacher Aide, Head Start - Sumner
Teacher Aide, Head Start - Genesee (2)
Teacher Aide, Head Start - Liverpool (2)
Nutrition Aide, Head Start - Liverpool
Nutrition Aide, Head Start - Baldwinsville
Administrative Assistant, Head Start, Sumner
Bus Driver, Head Start (full-time) (3)
Bus Driver, Head Start (part-time) (2)
Insulation Crew Member, DEHS Syracuse (2)
Mechanic, Transportation Dept.
Kitchen Worker/Driver, Food Services (2)
Kitchen Utility Worker, Food Services
EISEP Case Manager, County West FRC

P.E.A.C.E., Inc.

Benchmark Fee Report

May 12, 2022



Retirement Services • Investments

Assets as of: 5/11/2022

This report was generated with the 401k Averages Book's benchmarking software.

FOR PLAN SPONSOR AND INSTITUTIONAL USE ONLY

P.E.A.C.E., Inc.

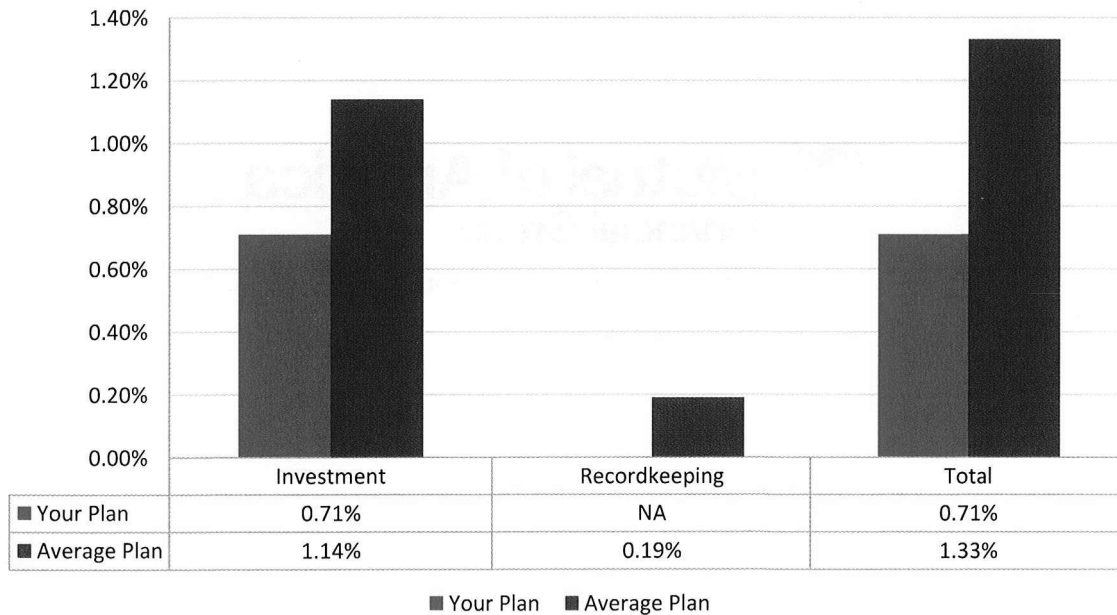
Benchmark Fee Report

Total Number of Participants: 469
Total Plan Assets: \$ 7,587,276

Plan Assets

Stable Asset/Money Market	\$ 231,500
Fixed Income	\$ 139,609
Balanced	\$ 47,274
Large US Equity	\$ 1,212,065
Mid US Equity	\$ 393,303
Small US Equity	\$ 111,908
International/Global Equity	\$ 107,314
Target Date	\$ 5,273,237
Specialty	\$ 71,065
Total	\$ 7,587,276

Total Plan Cost Comparison (%)

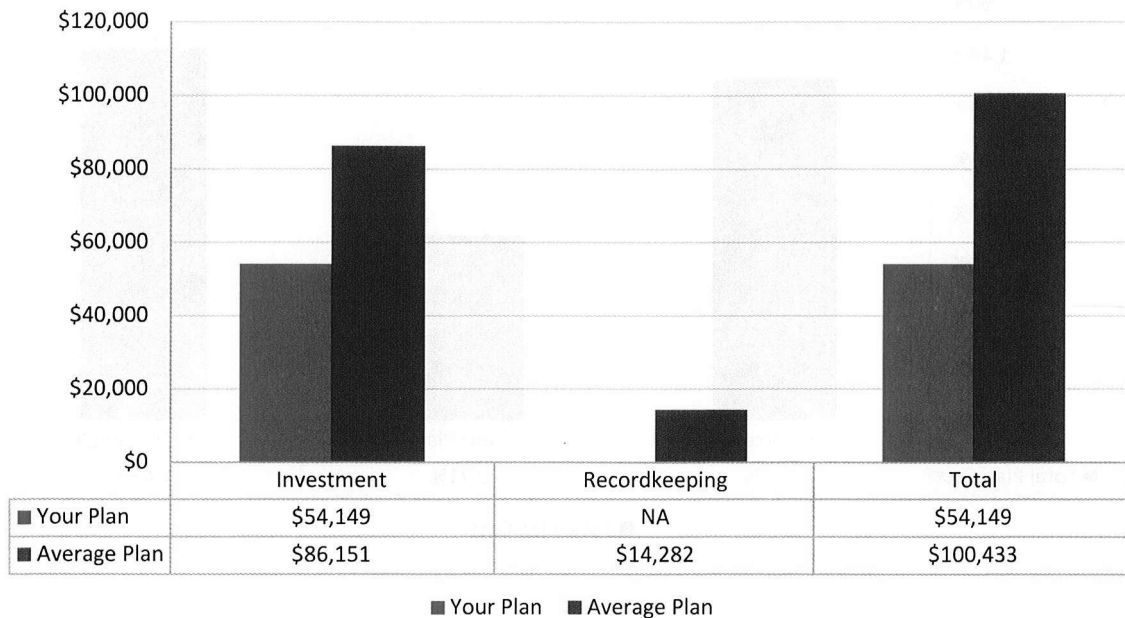


Universe Information: This benchmarking report was run with the 401k Comparator. The comparative universe for the Average Plan benchmark in this scenario consists of 55 401(k) products. 401k Averages Book shall not be liable for any errors in content or for any actions taken in reliance thereon. © 401k Averages Book All rights reserved.

P.E.A.C.E., Inc.

Benchmark Fee Report

Total Plan Cost Comparison (\$)



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Frequently Asked Questions

Where does the benchmark data in this report come from?

Published since 1995, the 401k Averages Book is the leading source of 401(k) fee benchmarking data. This benchmarking report was generated using the 401k Comparator, which is based on the 401k Averages Book database. The database is comprised of 195 product offerings from 66 providers. Products are placed in the appropriate universe based on their target market. Fee data has been updated through September 30, 2020.

How is the custom Average Plan fee benchmark calculated?

Your Plan's characteristics (Average Account Balance, Total Plan Assets and Number of Participants) are used to form a comparable subset of the 195 products in the 401k Comparator database. This subset is used to calculate your Plan's average plan fee benchmark. The universe used to calculate the Average Plan fee benchmark is based on tables that incorporate various average account balance sizes and participant accounts. Because every plan has a unique asset allocation the Average Plan benchmark reflects your Plan's specific asset allocation. If your Plan has an asset allocation of 40% Large Cap, 5% Mid Cap, 5% Small Cap, 10% International and 40% Fixed Income, then the Average Plan fee benchmark will reflect that same allocation. Thus, the Average Plan fee benchmark is customized to reflect your Plan's asset allocation, average account balance, total plan assets and number of participants. The number of products included in your benchmark universe is identified below each chart.

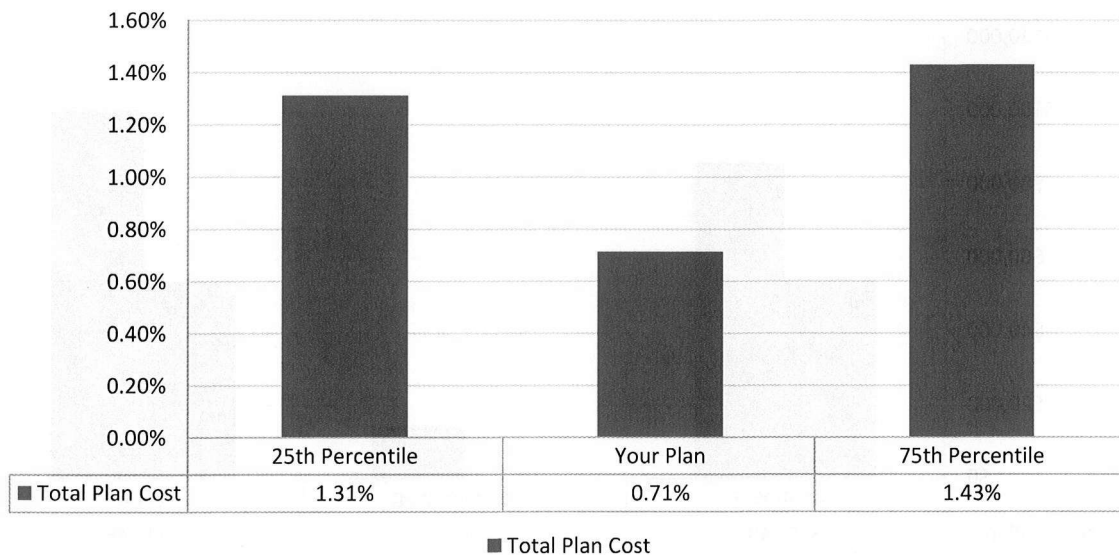
While the 401k Averages Book's benchmarking data is based on 401(k) plan fee data, we are not aware of similar data that is available for 403(b) or 401(a) plans or of any significant differences in fees between comparably sized 401(k), 403(b) and 401(a) plans.

Mutual of America does not have an explicit charge for recordkeeping services and does not provide trustee services. The cost of our recordkeeping services is included under the total fees column.

P.E.A.C.E., Inc.

Benchmark Fee Report

Total Plan Cost Range



Universe Information: This benchmarking report was run with the 401k Comparator. The comparative universe for the Average Plan benchmark in this scenario consists of 55 401(k) products. 401k Averages Book shall not be liable for any errors in content or for any actions taken in reliance thereon. © 401k Averages Book All rights reserved.

About the Range

This chart represents the range between the 25th percentile and 75th percentile, or the middle 50%. Reporting with ranges is helpful because outliers (typically showing up as the high or low) have less influence.

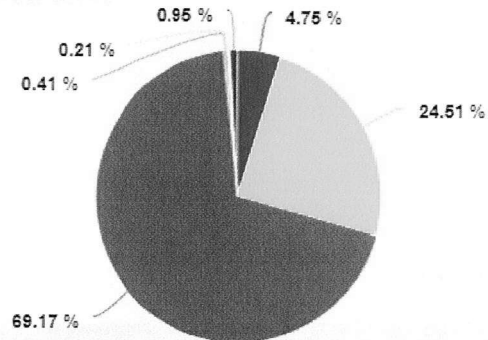
Example: Assume there are 60 products in the universe. 30 of those products have total plan costs that fall at or between a 1% and 1.5% (which is the middle 50%); 15 of the products have total plan costs 1.51% or higher and 15 were 0.99% or lower.

P.E.A.C.E., Inc.
Mutual of America
EIN: 16-6095039
As of May 17, 2022



Assets by Investment Class ⓘ

	Total
Retirement Funds	\$5,394,114.31
Equity Funds	\$1,911,683.15
Fixed Income	\$370,586.88
Real Estate Fund	\$74,085.04
Asset Allocation Funds	\$31,964.71
Balanced Funds	\$16,389.46
Total Allocated Assets	\$7,798,823.55
Unallocated Forfeitures and Non-Contributions	\$35,030.47
Grand Total	\$7,833,854.02



EMPLOYEE CONTRIBUTION STATUS

Active Accounts by Contribution ⓘ

Employer and Employee Contributions	235
Employer Contributions Only	0
Employee Contributions Only	12

Participation Rate

The Participation Rate is based on the data entered by the Plan Administrator.

Employees with an Active Status 433

Total Employees Eligible to Enroll

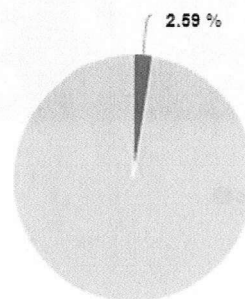
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Participation Rate ⓘ

ASSETS BY ACCOUNT

Asset Segmentation

Participants	540
Interest Account	\$202,016.72
Separate Account	\$7,596,806.83
Total	\$7,798,823.55



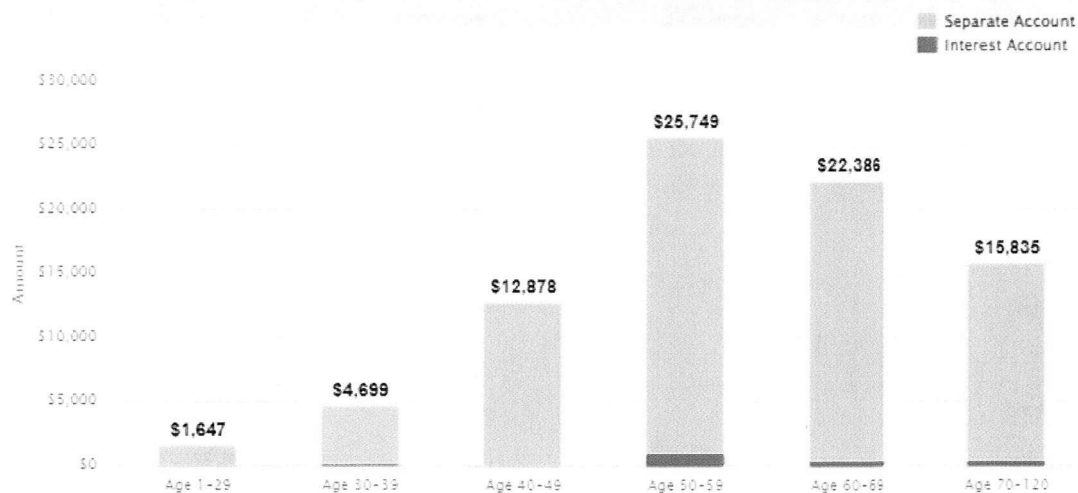
ASSETS BY GENDER

Asset	Female	Male	Unknown
Participants	422	118	0
Interest Account	\$158,280.05	\$43,736.67	\$0.00
Separate Account	\$5,574,156.04	\$2,022,650.79	\$0.00
Total	\$5,732,436.09	\$2,066,387.46	\$0.00

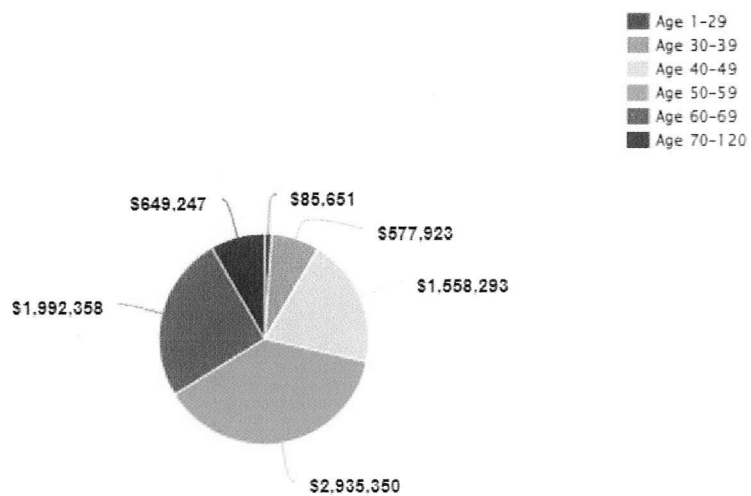
ASSETS BY EMPLOYEE STATUS

Asset Segmentation	Active	Inactive
Participants	433	107
Interest Account	\$188,427.63	\$13,589.09
Separate Account	\$6,979,396.30	\$617,410.53
Total	\$7,167,823.93	\$630,999.62

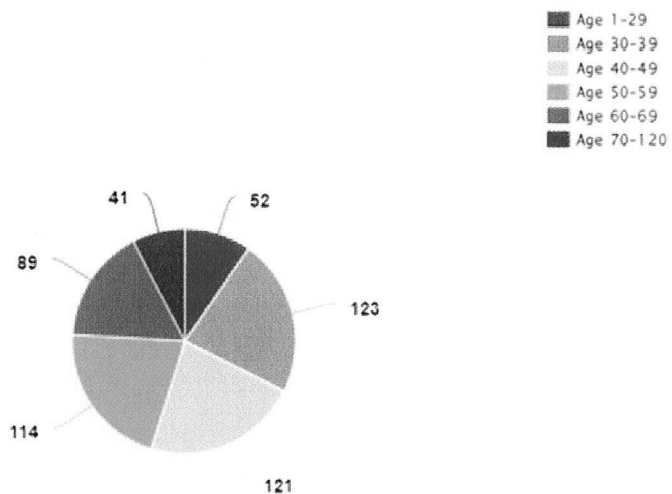
AVERAGE BALANCE BY AGE



TOTAL ASSETS BY AGE RANGE



PARTICIPANT COUNT BY AGE RANGE



Assets by Interest Account or Investment Option

Interest Account or Investment Option	Participants	Balance	Percent of Total
Mutual of America 2030 Retirement Fund	52	\$1,144,014.01	14.67%
Mutual of America 2035 Retirement Fund	42	\$841,742.26	10.79%
Mutual of America 2025 Retirement Fund	36	\$811,173.79	10.40%
Mutual of America 2020 Retirement Fund	35	\$683,862.06	8.77%
Mutual of America 2040 Retirement Fund	43	\$524,956.70	6.73%
Mutual of America 2050 Retirement Fund	82	\$520,140.52	6.67%
Mutual of America Equity Index Fund	14	\$314,298.76	4.03%
Mutual of America 2045 Retirement Fund	60	\$285,855.72	3.67%
T. Rowe Price Blue Chip Growth Portfolio	20	\$254,135.97	3.26%
Mutual of America 2015 Retirement Fund	14	\$239,638.99	3.07%
Mutual of America Retirement Income Fund	20	\$225,174.76	2.89%
Mutual of America Mid-Cap Equity Index Fund	9	\$211,148.97	2.71%
Mutual of America Interest Accumulation Account	27	\$202,016.72	2.59%
Fidelity® VIP Contrafund® Portfolio	10	\$174,737.63	2.24%
Fidelity® VIP Equity-Income Portfolio	5	\$151,001.02	1.94%
Vanguard VIF Diversified Value Portfolio	8	\$143,687.90	1.84%
Invesco V.I. Main Street Fund®	4	\$134,045.82	1.72%
Fidelity® VIP Mid Cap Portfolio	8	\$97,937.80	1.26%
Mutual of America 2055 Retirement Fund	36	\$95,080.92	1.22%
Vanguard VIF Real Estate Index Portfolio	8	\$74,085.04	0.95%
Mutual of America Small Cap Growth Fund	4	\$67,912.47	0.87%
PIMCO VIT Real Return Portfolio	4	\$66,762.88	0.86%
Vanguard VIF International Portfolio	6	\$66,646.82	0.85%
Mutual of America All America Fund	9	\$49,474.74	0.63%
Mutual of America Mid-Term Bond Fund	4	\$46,293.13	0.59%
Mutual of America Mid Cap Value Fund	5	\$38,415.92	0.49%
American Century Investments® VP Capital Appreciation Fund	8	\$37,687.50	0.48%
DWS Capital Growth VIP	6	\$36,195.09	0.46%
American Funds Insurance Series® New World Fund®	3	\$35,059.33	0.45%
Mutual of America Small Cap Value Fund	3	\$31,230.95	0.40%
MFS® VIT III Mid Cap Value Portfolio	1	\$30,421.39	0.39%
Mutual of America Money Market Fund	8	\$29,490.05	0.38%
Mutual of America 2060 Retirement Fund	17	\$19,522.51	0.25%
Mutual of America Bond Fund	5	\$18,194.66	0.23%
Delaware VIP® Small Cap Value Series	1	\$17,958.18	0.23%
Mutual of America Conservative Allocation Fund	6	\$12,596.02	0.16%
Fidelity® VIP Asset Manager Portfolio	3	\$12,519.14	0.16%

Interest Account or Investment Option	Participants	Balance	Percent of Total
Mutual of America International Fund	2	\$12,048.87	0.15%
Mutual of America Moderate Allocation Fund	6	\$10,338.22	0.13%
Mutual of America Aggressive Allocation Fund	3	\$9,030.47	0.12%
Vanguard VIF Total Bond Market Index Portfolio	1	\$7,829.44	0.10%
Goldman Sachs VIT US Equity Insights Fund	2	\$5,870.69	0.08%
Mutual of America Composite Fund	1	\$3,087.75	0.04%
Mutual of America 2065 Retirement Fund	2	\$2,952.07	0.04%
Goldman Sachs VIT Small Cap Equity Insights Fund	1	\$1,767.33	0.02%
Calvert VP SRI Balanced Portfolio	2	\$782.57	0.01%
Total		\$7,798,823.55	100%

Prepared for P.E.A.C.E., Inc.
Tier 3 (NA - Reduced) Pricing as of May 11, 2022
Plans Included: TDA, 401(k)

Fund Name	Account Balance	Total Annual Operating	Estimated Annual Expense
Equity Funds			
American Century Investments® VP Capital Appreciation Fund	\$35,689	0.93%	\$332
American Funds Insurance Series® New World Fund®	\$33,442	0.94%	\$314
Delaware VIP® Small Cap Value Series	\$16,977	1.13%	\$192
DWS Capital Growth VIP	\$34,547	0.84%	\$290
Fidelity® VIP Contrafund® Portfolio	\$167,755	0.86%	\$1,443
Fidelity® VIP Equity-Income Portfolio	\$146,559	0.78%	\$1,143
Fidelity® VIP Mid Cap Portfolio	\$92,769	0.87%	\$807
Goldman Sachs VIT Small Cap Equity Insights Fund	\$1,649	1.16%	\$19
Goldman Sachs VIT US Equity Insights Fund	\$5,648	0.91%	\$51
Invesco Oppenheimer V.I. Main Street Fund®	\$128,709	1.15%	\$1,480
MFS® VIT III Mid Cap Value Portfolio	\$29,043	0.91%	\$264
Mutual of America All America Fund	\$47,311	0.87%	\$412
Mutual of America Equity Index Fund	\$302,340	0.50%	\$1,512
Mutual of America International Fund	\$11,583	0.70%	\$81
Mutual of America Mid Cap Value Fund	\$36,680	1.09%	\$400
Mutual of America Mid-Cap Equity Index Fund	\$199,122	0.50%	\$996
Mutual of America Small Cap Growth Fund	\$63,558	1.16%	\$737
Mutual of America Small Cap Value Fund	\$29,724	1.17%	\$348
T. Rowe Price Blue Chip Growth Portfolio	\$241,487	0.85%	\$2,053
Vanguard VIF Diversified Value Portfolio	\$137,709	0.63%	\$868
Vanguard VIF International Portfolio	\$62,289	0.73%	\$455
Balanced Funds			
Calvert VP SRI Balanced Portfolio	\$770	0.98%	\$8
Fidelity® VIP Asset Manager Portfolio	\$12,263	0.85%	\$104
Mutual of America Composite Fund	\$3,016	0.89%	\$27
Asset Allocation Funds			
Mutual of America Aggressive Allocation Fund	\$8,714	0.67%	\$58
Mutual of America Conservative Allocation Fund	\$12,434	0.76%	\$95
Mutual of America Moderate Allocation Fund	\$10,077	0.65%	\$66
Fixed Income Funds			
Mutual of America Bond Fund	\$18,280	0.80%	\$146
Mutual of America Mid-Term Bond Fund	\$46,391	0.81%	\$376
Mutual of America Money Market Fund	\$29,492	0.58%	\$171
PIMCO VIT Real Return Portfolio	\$67,056	0.94%	\$630
Vanguard VIF Total Bond Market Index Portfolio	\$7,881	0.49%	\$39

Real Estate Fund			
Vanguard VIF Real Estate Index Portfolio	\$71,065	0.61%	\$433
Retirement Funds			
Mutual of America 2015 Retirement Fund	\$241,786	0.80%	\$1,934
Mutual of America 2020 Retirement Fund	\$672,002	0.74%	\$4,973
Mutual of America 2025 Retirement Fund	\$793,035	0.73%	\$5,789
Mutual of America 2030 Retirement Fund	\$1,113,683	0.71%	\$7,907
Mutual of America 2035 Retirement Fund	\$813,591	0.69%	\$5,614
Mutual of America 2040 Retirement Fund	\$505,694	0.68%	\$3,439
Mutual of America 2045 Retirement Fund	\$275,019	0.69%	\$1,898
Mutual of America 2050 Retirement Fund	\$522,528	0.69%	\$3,605
Mutual of America 2055 Retirement Fund	\$91,337	0.73%	\$667
Mutual of America 2060 Retirement Fund	\$18,750	0.68%	\$127
Mutual of America 2065 Retirement Fund	\$2,829	0.68%	\$19
Mutual of America Retirement Income Fund	\$222,982	0.82%	\$1,828
Interest Accumulation Account *			\$202,008
TOTAL PLAN BALANCE:			\$7,587,276
WEIGHTED AVERAGE FUND OPERATING EXPENSE:			0.71%
WEIGHTED AVERAGE FUND OPERATING EXPENSE EXCLUDING INTEREST ACCOUNT:			0.73%

The above chart applies Mutual of America's Separate Account expenses and underlying fund operating expenses (collectively, "Total Annual Operating Expense") to the "Account Balance" amounts for the purpose of calculating the "Estimated Annual Expense." The Estimated Annual Expense reflects the Account Balance and Total Annual Operating Expense as of the date shown on this Expense Analysis. The Actual Annual Expense may be higher or lower because the Account Balance for each fund fluctuates during the year and the underlying fund operating expenses may change. More information about the Separate Account expenses can be found in the contract prospectus or brochure, as applicable. Information about the underlying fund operating expenses can be found in the underlying funds prospectuses and summary prospectuses.

Participants who allocate all or part of their accounts to the Separate Account investment funds pay annual Separate Account expenses that are a percentage of the value of their account allocated to the investment funds. An employer's total plan assets are used to determine Separate Account pricing. This total-asset relationship-based pricing will apply to 401(k) and 403(b) Thrift Plans, 401(a) and 401(k) Profit-Sharing Plans, 403(b) Tax-Deferred Annuity Plans, 401(a) Money Purchase Pension Plans, and Governmental Section 457(b) Plans. Our standard annual Separate Account expenses, applicable to plans of employers with less than \$1 million in total assets, are 1.35%. For employers with total plan assets of at least \$50 million, we reduce the annual Separate Account expenses to 0.25% (Tier 1). For employers with total plan assets of at least \$25 million but less than \$50 million, we reduce the annual Separate Account expenses to 0.35% (Tier 2). For employers with total plan assets of at least \$5 million but less than \$25 million, we reduce the annual Separate Account expenses to 0.45% (Tier 3). For employers with total plan assets of at least \$2 million but less than \$5 million, we reduce the annual Separate Account expenses to 0.60% (Tier 4). For employers with total plan assets of at least \$1 million but less than \$2 million, we reduce the annual Separate Account expenses to 0.95% (Tier 5).

For certain national accounts, our standard annual Separate Account expenses, applicable to plans of employers with less than \$1 million in total assets, are 1.35%. For employers with total plan assets of at least \$50 million, we reduce the annual Separate Account expenses to 0.25% (Tier 1-National Accounts). For employers with total plan assets of at least \$25 million but less than \$50 million, we reduce the annual Separate Account expenses to 0.30% (Tier 2-National Accounts). For employers with total plan assets of at least \$5 million but less than \$25 million, we reduce the annual Separate Account expenses to 0.35% (Tier 3-National Accounts). For employers with total plan assets of at least \$2 million but less than \$5 million, we reduce the annual Separate Account expenses to 0.40% (Tier 4-National Accounts). For employers with total plan assets of at least \$1 million but less than \$2 million, we reduce the annual Separate Account expenses to 0.85% (Tier 5-National Accounts).

Tier 1, Tier 2, Tier 3, Tier 4 and Tier 5 reductions take place in the next calendar quarter after the asset thresholds have been met or exceeded and continue as long as the Separate Account assets do not fall below \$45 million (Tier 1), \$22.5 million (Tier 2), \$4.5 million

(Tier 3), \$1.8 million (Tier 4), and \$900,000 (Tier 5). Employers must remit premium and use Mutual of America SponsorConnectSM to administer their plan in order to be eligible for Reduced Fees.

In addition, the Underlying Funds incur annual expenses (including management fees and other expenses). See the underlying fund prospectuses for specific details.

For amounts allocated to the American Century VP Capital Appreciation Fund, the advisor has agreed to waive 0.07 percentage points of the Fund's management fees. The advisor expects this waiver to continue until April 30, 2022, and cannot terminate it prior to such date without the approval of the Board of Directors of the Fund. See the underlying fund prospectus for details.

The adviser of the T. Rowe Price Blue Chip Growth Portfolio has agreed to waive a portion of its management fee in order to limit the Fund's management fees to 0.75% through at least April 30, 2022. See the underlying fund summary prospectus for details.

The adviser of the Goldman Sachs U.S. Equity Insights Fund has agreed to (i) waive a portion of its management fee in order to achieve an effective net management fee rate of 0.54% of the Fund's average daily net assets, and (ii) reduce or limit "Other Expenses" (excluding acquired fund fees and expenses, transfer agency fees and expenses, taxes, interest, brokerage fees, expenses of shareholder meetings, litigation and indemnification, and extraordinary expenses) equal on an annualized basis to 0.004% of the Fund's average daily net assets. These arrangements will remain in effect through at least April 30, 2022.

* Mutual of America also makes available the Interest Accumulation Account of its General Account that pays a fixed rate of interest declared by us from time to time, which is not reduced by expenses. Allocations under a contract to the General Account become part of our general assets, and we invest the assets of the General Account, subject to applicable law. Mutual of America bears the full investment risk for all amounts that Participants allocate to the General Account, and Participants making such allocations are not entitled to share in the investment experience of the General Account.

The interest rate credited to amounts in the Interest Accumulation Account currently results in an effective annual yield of 1%. Interest is compounded daily to produce the stated effective annual yield.

We guarantee that we will credit interest for the life of the contract to amounts in the Interest Accumulation Account of our General Account at a rate at least equal to the greater of (1) any contractual minimum guarantee provided by the contract or (2) the minimum rate required by applicable state law, or if no state law minimum rate is applicable to a contract, a rate equivalent to the minimum guaranteed credited interest rate determined in accordance with the National Association of Insurance Commissioners (NAIC) standard non-forfeiture law. The NAIC minimum rate is determined in accordance with a formula and cannot be less than an effective annual yield of 1% or more than an effective annual yield of 3% in any event. We determine whether the application of the formula will change the minimum guaranteed rate each November, and any change is effective the following January 1 for that calendar year. The current minimum rate has been set at an effective annual yield of 1% in accordance with this formula for all contracts that do not have a contractual minimum guarantee of an effective annual yield of 3% or 1.5%. If your contract has a contractual guaranteed minimum rate of an effective annual yield of 3% or 1.5%, the interest rate under your contract will not go below that amount regardless of the minimum rate that is set for a calendar year.

In our sole discretion, we may credit a higher rate of interest to your contract amounts in the General Account, although we are not obliged to credit interest in excess of the minimum rate that is set for a calendar year. Amounts deposited to the Interest Accumulation Account, as well as interest that has been credited to the account, are guaranteed by Mutual of America. This guarantee is subject to Mutual of America's financial strength and claims-paying ability.

Mutual of America
 Fee Disclosure and Important Notice
 401(k) Exclusive Services Arrangement

This document outlines our services and fees.

The following disclosure is intended to describe the services provided by, and the compensation reasonably expected to be received by, Mutual of America Life Insurance Company ("Mutual of America" or "Company") and its affiliates in connection with the group annuity contract ("Contract") used as the exclusive funding vehicle for your 401(k) Plan ("Plan").

The following information is provided pursuant to, and is intended to comply with, the U.S. Department of Labor ("DOL") Regulation issued under Section 408(b)(2) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). Amounts expressed in this document that represent compensation Mutual of America is expected to receive in connection with the services provided are reasonable, good-faith estimates that may vary based on the amount and level of services actually provided to you in conjunction with the administration of your Plan.

Please note that Mutual of America is providing this disclosure document to employers or other plan administrators ("employers") in conjunction with their retirement and savings plans without regard to whether such plans are governed by ERISA. Receipt of this disclosure document is not intended to, and should not be construed to, indicate that your Plan is or is not an "ERISA Plan." Certain services described below are applicable only to ERISA-covered plans and are not available to plans not subject to ERISA.

If you would like additional information, please contact your Mutual of America representative.

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Mutual of America
Fee Disclosure and Important Notice
401(k) Exclusive Services Arrangement

I. SERVICES

The following describes the services provided by Mutual of America under the Exclusive Services arrangement to employers with respect to their 401(k) Profit-Sharing Plans or Safe-Harbor 401(k) Profit-Sharing Plans.

The Exclusive Services arrangement is available only if (i) a 401(k) Profit-Sharing Plan or Safe-Harbor 401(k) Profit-Sharing Plan is maintained under a Mutual of America plan document that has been approved by the Internal Revenue Service ("IRS") as to form (a Prototype Plan Document) or under a non-prototype plan document that Mutual of America considers eligible for the Exclusive Services arrangement, and (ii) a Contract issued by Mutual of America is the exclusive funding vehicle for all assets under the Plan (unless Mutual of America agrees to waive this requirement) and all contributions to be made to the Plan.

Under this Contract, your Plan's participants may invest in Mutual of America's General Account (the "Interest Accumulation Account") or in one or more investment funds held in sub-accounts of a Mutual of America Separate Account. In addition, we provide consulting services on regulatory compliance tasks required to be performed by the employer and ministerial functions as they relate to the operation of the Plan. We also provide education in the use of and access to the Company's online remittance processing and administrative systems, including the online retirement plan administration system provided by Mutual of America. Many of the recordkeeping functions and services described below are provided via these systems.

A. Document Preparation Services

- 1) Plan documents as needed prepared for employer review:
 - a. Prototype Plan Document and a related Adoption Agreement containing the 401(k) Profit-Sharing Plan specifications selected by the employer; or
 - b. Prototype Plan Document and a related Adoption Agreement containing the Safe Harbor 401(k) Profit-Sharing Plan specifications selected by the employer; or
 - c. Non-prototype plan document and a related Adoption Agreement, if using an individually-designed plan; and
 - d. Amendments to the Plan specifications (as needed) that Mutual of America considers eligible for this Exclusive Services arrangement.
- 2) A Summary Plan Description (SPD) or, if applicable, a Summary of Material Modifications (SMM) to a prior SPD prepared for employer review and employer distribution to participants.
- 3) As applicable, preparation of the initial specimen Qualified Default Investment Alternative (QDIA) notifications for employer review, completion and distribution to affected participants. We maintain records of participants to whom notifications must be given.
- 4) As applicable, preparation and distribution to affected participants of the annual Qualified Default Investment Alternative (QDIA) notifications. We maintain records of participants to whom the notices were sent.
- 5) As applicable, preparation of the initial specimen notification of Automatic Enrollment for employer review, completion and distribution to affected participants. We maintain records of participants to whom notifications have been given.

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- 6) As applicable, preparation and distribution to affected participants of the annual notification of Automatic Enrollment. We maintain records of participants to whom the notices were sent.
- 7) Financial information to assist employers in the completion and filing of Annual Return/Report Form 5500 ("Form 5500"). Also provided via the online retirement plan administration system provided by Mutual of America are an electronic filing service and drafts of employer's Form 5500 and related schedules, as applicable.
- 8) As applicable, issuance of group annuity certificates and "summary of benefits" statements to participants.

B. Recordkeeping Services

- 1) Enrollment and maintenance of participant related information;
- 2) Maintenance of employer information pertaining to plan provisions to assist the employer in the administration of the Plan;
- 3) An online platform for processing contributions and loan repayments.
- 4) Pre-default notification to participants and employers of past due loan repayment amounts necessary to avoid default;
- 5) Maintenance of individual accounts permitting participant access to account balance information. Participants will also have the ability to change allocations and make transfers among the investment alternatives;
- 6) Notification to employers and participants regarding those participants who are required to receive minimum distributions from their account under the federal tax law and payment of such distributions unless directed by the employer not to do so;
- 7) Preparation of benefit estimates for participants upon request;
- 8) Retirement kit for participants at or nearing retirement age upon request;
- 9) Pending status reports to remind employers to complete termination processing for former plan participants;
- 10) Based solely on the provisions of your Plan, payment of involuntary distributions (*i.e.*, cash-out of small benefits as permitted by applicable law);
- 11) Implementation of Qualified Domestic Relations Orders (QDROs) dividing Plan benefits after approval by the employer and review of draft DROs to assist the employer in their approval process;
- 12) Processing participant loan applications and administration of loans upon direction of the employer if participant loans are available under the Plan;
- 13) Processing claims for benefits and disbursement of benefit payments;

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- 14) We will issue for delivery to each Participant who receives Annuity Payments an individual certificate setting forth the amount and terms of payment of their Annuity Payments. We provide "summary of benefits" statements and not individual certificates with respect to monthly benefit payments provided other than through the purchase of an annuity. We will send Annuity Payments directly to Annuitants at the last address reported to us by a Participant or Contractholder;
- 15) Income tax withholding from benefit payments and related tax reporting;
- 16) Periodic educational notices and publications concerning certain legislative and regulatory developments that may impact your Plan;
- 17) Maintenance of forfeitures, including the preparation of an annual Forfeiture Reallocation Schedule for employer review and authorization, or for use as credit in the remittance process, if applicable;
- 18) An online platform with instructions for the employer to perform Actual Deferral Percentage (ADP) and Actual Contribution Percentage (ACP) testing, if applicable. Upon request, a kit is available via mail as an alternative;
- 19) Monitoring of elective deferrals under the Contract relative to applicable limits for review by employers following notification and, upon request, calculation of applicable interest earnings on amounts refunded as excess elective deferrals;
- 20) If permitted by the employer, participants can make salary deferral elections and deferral changes online. Employers are notified via email the next business day if any changes have been made. A Deferral Rate Changes Report for payroll administration is also available through the online retirement plan administration system provided by Mutual of America;
- 21) Preparation of pre-retirement Qualified Joint & Survivor Annuity (QJSA) notices with normal form benefit calculations and relative value charts and disclosures for all optional forms of annuity available under the Plan; and
- 22) As applicable, Payroll Integration process allowing the automated exchange of data between the payroll system of the plan sponsor and the online retirement plan administration system provided by Mutual of America.

C. Investment Related Services

- 1) Maintenance and operation of the Interest Accumulation Account and Separate Accounts;
- 2) Quarterly reports to employers showing contributions Mutual of America received and applied under the Contract during each calendar quarter;
- 3) Quarterly statements to participants which satisfy the ERISA requirements for Pension Benefit Statements showing the opening and closing balances in their accounts under the Contract, financial activity in those accounts during each calendar quarter, as well as vested account information;
- 4) Annual fund reports to employers showing the opening and closing balances, as well as all financial activity under the Contract, for each plan year;

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- 5) Independent Auditor's Report of Mutual of America's Separate Account (if, under the Contract, funds are held in the Separate Account); and
- 6) Service Organization Control (SOC) (formerly the SSAE) Report on Retirement Plan Processing to employers available on the online retirement plan administration system provided by Mutual of America or upon request.

D. Other Services Provided

We provide on-site assistance.

- 1) Enrollment information on-site in participant meetings;
- 2) Retirement plan information on-site and via the 800 line;
- 3) Participant education with respect to investment alternatives;
- 4) Individual assistance to plan participants with respect to transactions via the website, 800 line or on-site;
- 5) Educational information and materials about general financial and investment concepts provided in group seminars and individual meetings; and
- 6) Assistance on-site to plan representatives in the use of our remittance processing, payment and administrative systems.

II. COMPENSATION

The DOL Regulation requires that we provide you with information regarding the compensation we expect to receive for the services provided to your Plan. As stated above, these amounts are based on good-faith, reasonable estimates, and may vary from amounts actually received by Mutual of America.

A. Employer Paid Charges

NOTE: These contract holder charges are not paid, directly or indirectly, by the Plan or the plan participants, and do not affect the value of participant accounts. They are not subject to, and are not required by the DOL Regulation to be disclosed; however, for your information we have included the standard charges paid by the employer for the services described in this document. The fee for additional services not described in this document that are provided at the plan sponsor's request will be paid by the plan sponsor and disclosed in a separate statement unless the fee for such services is waived in accordance with the Company's pricing policy (e.g., assistance with other nondiscrimination testing upon request). When you compare our charges to those of other providers, you should keep in mind that such employer or contract holder paid charges may not be included in the fee disclosure of other service providers.

Contract Holder's Administrative Charges: a Monthly Contract Charge of \$100.00 per month and a Monthly Per Participant Charge equal to \$4.00 for each of the first 50 active participants; \$2.00 for each of the next 50 active participants; and \$1.00 for each of the next 100 active participants. (Note: any entity affiliated with an employer that is participating in the employer's Plan is subject to administrative charges equal to ½ of the Monthly Contract Charge plus the same Monthly Per Participant Charges applicable to the services arrangement adopted by the employer.) These charges are payable by and will be billed to contract holders each month, and **are not deducted**

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from participant accounts or Plan assets. These charges will be waived for any month if, on the last day of that month, the total of participants' account balances held under the Contract(s) then equal or exceed \$1.0 million (certain affiliated plans are aggregated for purposes of this total), the employer is remitting contributions, and the employer is using the online retirement plan administration system provided by Mutual of America. After a Plan qualifies for the waiver of Monthly Contract and Monthly Per Participant Charges, the Plan must maintain total assets of at least \$900,000 as of the last day of a month to remain eligible for the waiver for the following month. In certain cases, plans may have either one of these Charges waived.

B. Direct Compensation

The term "direct compensation" means "compensation received directly from the covered plan."

In connection with the services we make available to your Plan; we charge the following fees directly to the Plan, unless you, the employer, pay the Participant's Administrative (Contract) Charge on behalf of the Plan or the participants and beneficiaries from your own general assets or other sources that are not Plan assets. The direct compensation we reasonably expect to receive is divided into the following categories:

- 1) *Forfeiture Processing Charge:* For plans with a vesting schedule, there is a charge for processing the forfeiture with respect to employees who terminate employment with a non-vested balance. This charge is \$50.00 (or the amount of the non-vested balance if the balance is less than \$50.00) and is deducted from the non-vested account balance when the forfeiture is processed. For a given plan, the total of all forfeiture processing charges is limited to \$2,500.00 per calendar year;

For plans with a vesting schedule, a Forfeiture Processing Charge will not be assessed against the non-vested balance of employees who terminate employment if the total of participants' account balances under the Contract(s) equal or exceed \$1.0 million; the employer is remitting contributions, and the employer is using the online retirement plan administration system provided by Mutual of America to administer the Plan.

- 2) *Participant's Administrative (Contract) Charge:* A charge of \$2.00 per month is payable by each participant, former participant or alternate payee with an account balance under the Plan and will be deducted each month from each individual account balance unless you, the employer, have elected to pay it. If you have elected to pay the charge, it is \$2.00 for each participant per month. The monthly participant (Contract) charge will not exceed 1/12 of 1% of any account balance, and will not apply to an individual account for any month if, on the last day of that month, such account balance is less than \$300.00;
 - a. *Waiver of Charges:* The participant's administrative (Contract) charge will be waived with respect to a participant, a former participant or an alternate payee with an account balance under the Plan, who consents to and continues to use eDocuments, which is a service available through the Mutual of America website. eDocuments offers participants the opportunity to receive certain reports and communications through our website instead of through the mail. After consenting to receive certain electronic documents, participants receive periodic emails notifying them that quarterly statements, prospectuses, annual and semi-annual reports of the underlying funds, as well as any future documents we make available electronically, are online. The waiver of the administrative (Contract) charge for Plans that have at least \$15 million in Contract assets will be eliminated effective July 1, 2020.

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- 3) **Loan Fees:** If loans are available under your Plan on a trustee basis, a non-refundable Loan Origination Fee will be paid at the time the loan is made by deducting it from the amount of the loan. If your Plan previously provided for non-trusteed loans, collateralized by amounts held under the Contract attributable to the borrowing participant's account, and any of these collateralized loans continue to be repaid, then there was no loan origination fee paid by the borrower, and instead, a portion of the loan interest paid by the participant represents the charge for such collateralized "policy" loans. The following fee schedule includes fees payable by a participant for a loan made to the participant.
- a. For trustee loans to be repaid via payroll deduction, a non-refundable origination fee of \$75.00 plus a separate annual, non-refundable \$15.00 maintenance fee will be charged in a single sum based on the term of the loan at the time the loan is made, in addition to interest the Plan participant pays at the prime rate plus 1% to the participant's account.
 - b. For trustee loans to be repaid via direct billing to a participant, the non-refundable Loan Origination Fee is \$350.00, in addition to interest the Plan participant pays at the prime rate plus 1% to the participant's account.
 - c. For loans collateralized by a loan reserve amount held in the portion of the participant's account allocated to the General Account equal to 120% of the loan amount, and where there is no trustee for such "policy" loans, we do not charge origination fees or annual fees. However, the loan interest rate on such loans is 3% higher than the interest rate we credit to amounts held in the General Account as collateral for the loan. This additional 3% is paid by the participant via payroll deduction (which the employer remits to us) or home billing and retained by us. If any loan repayment is not paid when due and remains unpaid on the last day of the second calendar month following the calendar month in which it was originally due, the participant will be in default. In that event, if then permitted by applicable law, the loan balance including accrued interest will be accelerated, and the portion of the participant's account balance in the Interest Accumulation Account under the Contract will be reduced by the amount payable inclusive of unpaid interest or other applicable charges. To the extent the reduction cannot then be made, the portion of the participant's account held in the Interest Accumulation Account will be reduced upon the earliest occurrence of an event which, under applicable law and the Plan, would permit such a reduction to be made (e.g., participant's eligibility for a distribution under the Plan, such as upon termination of employment).
 - d. Certain late fees are assessed for home billed payments received 30 days after the due date. These fees are the lesser of \$15.00 or 5% of the payment that was due.

C. Indirect Compensation

The term "indirect compensation" generally means compensation received from any source other than the covered plan, the employer, the covered service provider, an affiliate, or a subcontractor. The indirect compensation we reasonably expect to receive in connection with the services described in Section I, above, includes the following:

Separate Account Expenses:

Participants in your Plan may allocate contributions between the General Account and the Separate Account of the Contract funding your Plan.

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For purposes of determining the amount your Plan has in total Plan assets required for eligibility to receive Tier 1, Tier 2, Tier 3, Tier 4, or Tier 5 reduced expenses described in the table below, (1) the assets of any entity affiliated with an employer that is participating in the employer's Plan may be aggregated for such purpose or (2) the assets of any Plans that are maintained by a controlled group of companies or entities (which includes a group of corporations under Internal Revenue Code of 1986 ("IRC") Section 414(b), a group of trades or business under common control under IRC Section 414(c), or an affiliated service group under IRC Section 414(m)) will be aggregated for such purpose provided such Plans file Form 5500 with the Employee Benefits Security Administration as a "controlled group" in accordance with the instructions for the Form 5500.

We aggregate the total assets of the employer's 403(b), 401(k), 401(a) and governmental 457(b) defined contribution plans in any of our Separate Accounts and the General Account, or under the administration of our subsidiaries, to determine the employer's eligibility for Tier 1, Tier 2, Tier 3, Tier 4, or Tier 5 reduced expenses, which is determined on the last business day of each quarter. In addition, the employer must be remitting contributions under this Contract or another Mutual of America 403(b), 401(k), 401(a) or governmental 457(b) defined contribution plan group annuity contract, and using the online administration system provided by Mutual of America or a subsidiary, to be eligible for these reduced expenses.

With respect to the Separate Account, we charge the following:

<u>Amount of Total Account Assets</u>	<u>Separate Account Expenses & Tier</u>
\$50 million or more	0.25% (Tier 1)
At least \$25 million but less than \$50 million	0.35% (Tier 2)
At least \$5 million but less than \$25 million	0.45% (Tier 3)
At least \$2 million but less than \$5 million	0.60% (Tier 4)
At least \$1 million but less than \$2 million	0.95% (Tier 5)
Less than \$1 million	1.35% (Standard)

After a Plan becomes eligible for Tier 1, Tier 2, Tier 3, Tier 4, or Tier 5 pricing, it will continue to remain eligible as long as the total plan assets do not fall below \$45 million (Tier 1), \$22.5 million (Tier 2), \$4.5 million (Tier 3), \$1.8 million (Tier 4), and \$900,000 (Tier 5).

Any plan to which the employer is not remitting contributions will be subject to expenses of 1.65%, except in Maryland where they are 1.35%, unless the employer is remitting contributions to another Mutual of America 403(b), 401(k), 401(a) or governmental 457(b) defined contribution plan group annuity contract.

Reduction in Separate Account Expenses: In the case of the Fidelity VIP Funds, MFS VIT III Mid Cap Value Portfolio, PIMCO Variable Insurance Trust Real Return Portfolio, Victory RS Small Cap Growth Equity VIP Series, and T. Rowe Price Blue Chip Growth Portfolio, we receive payments (which are sometimes called "revenue sharing" payments) which are not retained by the Company. These payments are passed through to the fund participants and reduce the Separate Account expenses charged by the Company for amounts allocated to those funds.

Reduced Separate Account Expenses – Certain National Accounts: We reduce the Separate Account charges for member agencies of approved national accounts with at least \$325 million, determined on the last business day of each calendar quarter. After a Plan becomes eligible for National Accounts reduced pricing, the total assets in the member agencies' Contracts must

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remain above \$292.5 million. Additionally, to be eligible, the national association or headquarters of the national account must maintain its plan with Mutual of America, promote Mutual of America as an "exclusive retirement plan service provider" to its member agencies, provide us with information regarding member agencies, allow our participation as a vendor or presenter at its conferences, and allow outbound telephone contact with its member agencies. To be considered a member agency of such a national account, the member agency must have a published corporate mission consistent with that of the national account organization with which it is affiliated.

The National Account Reduced Separate Annual Expenses are as follows:

Tier 1 Reduced Fee	0.25%
Tier 2 Reduced Fee	0.30%
Tier 3 Reduced Fee	0.35%
Tier 4 Reduced Fee	0.40%
Tier 5 Reduced Fee	0.85%
Standard Fee	1.35%

Reduction in Separate Account Expenses: In the case of the Fidelity VIP Funds, MFS VIT III Mid Cap Value Portfolio, PIMCO Variable Insurance Trust Real Return Portfolio, Victory RS Small Cap Growth Equity VIP Series, and T. Rowe Price Blue Chip Growth Portfolio, we receive payments (which are sometimes called "revenue sharing" payments) which are not retained by the Company. These payments are passed through to the fund participants and reduce the Separate Account expenses charged by the Company for amounts allocated to those funds.

Interest Accumulation Account: The Company invests funds allocated to the Interest Accumulation Account, and pays a fixed rate of interest declared by the Company from time to time on funds allocated to the Interest Accumulation Account that is not reduced by expenses. The Company bears the full investment risk on the Interest Accumulation Account investments and guarantees principal and credited interest on such allocations.

Adjustment of Certain Transactions: When it is necessary to adjust certain transactions due to a processing delay or error, the Company completes such adjustments as soon as practicable on or after the day that the Company obtains all of the information necessary to complete the adjustment and restores the affected account balance to the economic position in which it would have been, had the delay or error not occurred. Due to daily fluctuations in the unit values of the various investment funds available under the Separate Accounts and the General Account, these adjustments may result in the Company gaining additional indirect compensation or absorbing losses.

The following tables show the estimated total annual operating expenses of the savings and investment options available to your Plan based on actual expense charges incurred during the year ended December 31, 2019. The total operating expenses are comprised of the Separate Account Expenses and the investment management fees and expenses applicable to each investment alternative. There are no additional ongoing fees, such as wrap fees or mortality charges.

**The following tables include all
Separate Account Expenses.**

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**Table of Total Annual Operating Expenses of the
Interest Accumulation Account and Investment Alternatives**

Fund Name	Total Operating Expense Deductions					
	Standard	Tier 5	Tier 4	Tier 3	Tier 2	Tier 1
Interest Accumulation Account	Fixed rate of interest not reduced by expenses.					
Equity Funds						
American Century Investments® VP Capital Appreciation Fund	1.88%	1.48%	1.13%	0.98%	0.88%	0.78%
American Funds Insurance Series New World Fund®	2.11%	1.71%	1.36%	1.21%	1.11%	1.01%
Delaware VIP® Small Cap Value Series	2.12%	1.72%	1.37%	1.22%	1.12%	1.02%
DWS Capital Growth VIP	1.85%	1.45%	1.10%	0.95%	0.85%	0.75%
Fidelity® VIP Contrafund Portfolio	1.86%	1.46%	1.10%	0.96%	0.86%	0.76%
Fidelity® VIP Equity-Income Portfolio	1.78%	1.38%	1.03%	0.88%	0.78%	0.68%
Fidelity® VIP Mid Cap Portfolio	1.86%	1.46%	1.11%	0.96%	0.86%	0.76%
Goldman Sachs VIT Small Cap Equity Insights Fund	2.40%	2.00%	1.65%	1.50%	1.40%	1.30%
Goldman Sachs VIT US Equity Insights Fund	2.11%	1.71%	1.36%	1.21%	1.11%	1.01%
Invesco Oppenheimer V.I. Main Street Fund®	2.17%	1.77%	1.42%	1.27%	1.17%	1.07%
MFS® VIT III Mid Cap Value Portfolio	1.90%	1.50%	1.15%	1.00%	0.90%	0.80%
Mutual of America All America Fund	1.84%	1.44%	1.09%	0.94%	0.84%	0.74%
Mutual of America Equity Index Fund	1.48%	1.08%	0.73%	0.58%	0.48%	0.38%
Mutual of America International Fund	1.69%	1.29%	0.94%	0.79%	0.69%	0.59%
Mutual of America Mid Cap Value Fund	2.01%	1.61%	1.26%	1.11%	1.01%	0.91%
Mutual of America Mid-Cap Equity Index Fund	1.48%	1.08%	0.73%	0.58%	0.48%	0.38%
Mutual of America Small Cap Equity Index Fund	1.49%	1.09%	0.74%	0.59%	0.49%	0.39%
Mutual of America Small Cap Growth Fund	2.16%	1.76%	1.41%	1.26%	1.16%	1.06%
Mutual of America Small Cap Value Fund	2.16%	1.76%	1.41%	1.26%	1.16%	1.06%
Neuberger Berman Advisers Management Trust Sustainable Equity Portfolio	2.28%	1.88%	1.53%	1.38%	1.28%	1.18%
T. Rowe Price Blue Chip Growth Portfolio	1.85%	1.45%	1.10%	0.95%	0.85%	0.75%
Vanguard VIF Diversified Value Portfolio	1.59%	1.19%	0.84%	0.69%	0.59%	0.49%
Vanguard VIF International Portfolio	1.73%	1.33%	0.98%	0.83%	0.73%	0.63%
Victory RS Small Cap Growth Equity VIP Series	2.31%	1.91%	1.56%	1.41%	1.31%	1.21%
Bond Funds						
Mutual of America Bond Fund	1.79%	1.39%	1.04%	0.89%	0.79%	0.69%
Mutual of America Mid-Term Bond Fund	1.80%	1.40%	1.05%	0.90%	0.80%	0.70%
PIMCO VIT Real Return Portfolio	2.63%	2.23%	1.88%	1.73%	1.63%	1.53%
Vanguard VIF Total Bond Market Index Portfolio	1.49%	1.09%	0.74%	0.59%	0.49%	0.39%
Other						
Calvert VP SRI Balanced Portfolio	1.97%	1.57%	1.22%	1.07%	0.97%	0.87%
Fidelity® VIP Asset Manager Portfolio	1.85%	1.45%	1.11%	0.95%	0.85%	0.75%
Mutual of America Retirement Income Fund	1.80%	1.40%	1.05%	0.90%	0.80%	0.70%
Mutual of America 2010 Retirement Fund*	1.72%	1.32%	0.97%	0.82%	0.72%	0.62%
Mutual of America 2015 Retirement Fund	1.77%	1.37%	1.02%	0.87%	0.77%	0.67%
Mutual of America 2020 Retirement Fund	1.73%	1.33%	0.98%	0.83%	0.73%	0.63%
Mutual of America 2025 Retirement Fund	1.72%	1.32%	0.97%	0.82%	0.72%	0.62%

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Fund Name	Total Operating Expense Deductions					
	Standard	Tier 5	Tier 4	Tier 3	Tier 2	Tier 1
Mutual of America 2030 Retirement Fund	1.70%	1.30%	0.95%	0.80%	0.70%	0.60%
Mutual of America 2035 Retirement Fund	1.68%	1.28%	0.93%	0.78%	0.68%	0.58%
Mutual of America 2040 Retirement Fund	1.69%	1.29%	0.94%	0.79%	0.69%	0.59%
Mutual of America 2045 Retirement Fund	1.69%	1.29%	0.94%	0.79%	0.69%	0.59%
Mutual of America 2050 Retirement Fund	1.70%	1.30%	0.95%	0.80%	0.70%	0.60%
Mutual of America 2055 Retirement Fund	1.75%	1.35%	1.00%	0.85%	0.75%	0.65%
Mutual of America 2060 Retirement Fund	1.68%	1.28%	0.93%	0.78%	0.68%	0.58%
Mutual of America 2065 Retirement Fund (Effective on/after August 3, 2020)	1.68%	1.28%	0.93%	0.78%	0.68%	0.58%
Mutual of America Conservative Allocation Fund	1.74%	1.34%	0.99%	0.84%	0.74%	0.64%
Mutual of America Moderate Allocation Fund	1.64%	1.24%	0.89%	0.74%	0.64%	0.54%
Mutual of America Aggressive Allocation Fund	1.64%	1.24%	0.89%	0.74%	0.64%	0.54%
Mutual of America Composite Fund	1.85%	1.45%	1.10%	0.95%	0.85%	0.75%
Mutual of America Money Market Fund	1.59%	1.19%	0.84%	0.69%	0.59%	0.49%
Vanguard VIF Real Estate Index Portfolio	1.61%	1.21%	0.86%	0.71%	0.61%	0.51%

*This fund will be eliminated on or after July 31, 2020, through a substitution order and will no longer be available as a Separate Account investment fund selection.

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**Table of Total Annual Operating Expenses of the
Interest Accumulation Account and Investment Alternatives – National Accounts**

Fund Name	Total Operating Expense Deductions					
	Standard	Tier 5	Tier 4	Tier 3	Tier 2	Tier 1
Interest Accumulation Account	Fixed rate of interest not reduced by expenses.					
Equity Funds						
American Century Investments® VP Capital Appreciation Fund	1.88%	1.38%	0.93%	0.88%	0.83%	0.78%
American Funds Insurance Series New World Fund®	2.11%	1.61%	1.16%	1.11%	1.06%	1.01%
Delaware VIP® Small Cap Value Series	2.12%	1.62%	1.17%	1.12%	1.07%	1.02%
DWS Capital Growth VIP	1.85%	1.35%	0.90%	0.85%	0.80%	0.75%
Fidelity® VIP Contrafund Portfolio	1.86%	1.36%	0.90%	0.86%	0.81%	0.76%
Fidelity® VIP Equity-Income Portfolio	1.78%	1.28%	0.83%	0.78%	0.73%	0.68%
Fidelity® VIP Mid Cap Portfolio	1.86%	1.36%	0.91%	0.86%	0.81%	0.76%
Goldman Sachs VIT Small Cap Equity Insights Fund	2.40%	1.90%	1.45%	1.40%	1.35%	1.30%
Goldman Sachs VIT US Equity Insights Fund	2.11%	1.61%	1.16%	1.11%	1.06%	1.01%
Invesco Oppenheimer V.I. Main Street Fund®	2.17%	1.67%	1.22%	1.17%	1.12%	1.07%
MFS® VIT III Mid Cap Value Portfolio	1.90%	1.40%	0.95%	0.90%	0.85%	0.80%
Mutual of America All America Fund	1.84%	1.34%	0.89%	0.84%	0.79%	0.74%
Mutual of America Equity Index Fund	1.48%	0.98%	0.53%	0.48%	0.43%	0.38%
Mutual of America International Fund	1.69%	1.19%	0.74%	0.69%	0.64%	0.59%
Mutual of America Mid Cap Value Fund	2.01%	1.51%	1.06%	1.01%	0.96%	0.91%
Mutual of America Mid-Cap Equity Index Fund	1.48%	0.98%	0.53%	0.48%	0.43%	0.38%
Mutual of America Small Cap Equity Index Fund	1.49%	0.99%	0.54%	0.49%	0.44%	0.39%
Mutual of America Small Cap Growth Fund	2.16%	1.66%	1.21%	1.16%	1.11%	1.06%
Mutual of America Small Cap Value Fund	2.16%	1.66%	1.21%	1.16%	1.11%	1.06%
Neuberger Berman Advisers Management Trust Sustainable Equity Portfolio	2.28%	1.78%	1.33%	1.28%	1.23%	1.18%
T. Rowe Price Blue Chip Growth Portfolio	1.85%	1.35%	0.90%	0.85%	0.80%	0.75%
Vanguard VIF Diversified Value Portfolio	1.59%	1.09%	0.64%	0.59%	0.54%	0.49%
Vanguard VIF International Portfolio	1.73%	1.23%	0.78%	0.73%	0.68%	0.63%
Victory RS Small Cap Growth Equity VIP Series	2.31%	1.81%	1.36%	1.31%	1.26%	1.21%
Bond Funds						
Mutual of America Bond Fund	1.79%	1.29%	0.84%	0.79%	0.74%	0.69%
Mutual of America Mid-Term Bond Fund	1.80%	1.30%	0.85%	0.80%	0.75%	0.70%
PIMCO VIT Real Return Portfolio	2.63%	2.13%	1.68%	1.63%	1.58%	1.53%
Vanguard VIF Total Bond Market Index Portfolio	1.49%	0.99%	0.54%	0.49%	0.44%	0.39%
Other						
Calvert VP SRI Balanced Portfolio	1.97%	1.47%	1.02%	0.97%	0.92%	0.87%
Fidelity® VIP Asset Manager Portfolio	1.85%	1.35%	0.91%	0.85%	0.80%	0.75%
Mutual of America Retirement Income Fund	1.80%	1.30%	0.85%	0.80%	0.75%	0.70%
Mutual of America 2010 Retirement Fund*	1.72%	1.22%	0.77%	0.72%	0.67%	0.62%
Mutual of America 2015 Retirement Fund	1.77%	1.27%	0.82%	0.77%	0.72%	0.67%
Mutual of America 2020 Retirement Fund	1.73%	1.23%	0.78%	0.73%	0.68%	0.63%
Mutual of America 2025 Retirement Fund	1.72%	1.22%	0.77%	0.72%	0.67%	0.62%

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Fund Name	Total Operating Expense Deductions					
	Standard	Tier 5	Tier 4	Tier 3	Tier 2	Tier 1
Mutual of America 2030 Retirement Fund	1.70%	1.20%	0.75%	0.70%	0.65%	0.60%
Mutual of America 2035 Retirement Fund	1.68%	1.18%	0.73%	0.68%	0.63%	0.58%
Mutual of America 2040 Retirement Fund	1.69%	1.19%	0.74%	0.69%	0.64%	0.59%
Mutual of America 2045 Retirement Fund	1.69%	1.19%	0.74%	0.69%	0.64%	0.59%
Mutual of America 2050 Retirement Fund	1.70%	1.20%	0.75%	0.70%	0.65%	0.60%
Mutual of America 2055 Retirement Fund	1.75%	1.25%	0.80%	0.75%	0.70%	0.65%
Mutual of America 2060 Retirement Fund	1.68%	1.18%	0.73%	0.68%	0.63%	0.58%
Mutual of America 2065 Retirement Fund (Effective on/after August 3, 2020)	1.68%	1.18%	0.73%	0.68%	0.63%	0.58%
Mutual of America Conservative Allocation Fund	1.74%	1.24%	0.79%	0.74%	0.69%	0.64%
Mutual of America Moderate Allocation Fund	1.64%	1.14%	0.69%	0.64%	0.59%	0.54%
Mutual of America Aggressive Allocation Fund	1.64%	1.14%	0.69%	0.64%	0.59%	0.54%
Mutual of America Composite Fund	1.85%	1.35%	0.90%	0.85%	0.80%	0.75%
Mutual of America Money Market Fund	1.59%	1.09%	0.64%	0.59%	0.54%	0.49%
Vanguard VIF Real Estate Index Portfolio	1.61%	1.11%	0.66%	0.61%	0.56%	0.51%

*This fund will be eliminated on or after July 31, 2020, through a substitution order and will no longer be available as a Separate Account investment fund selection.

D. Compensation Paid Among Related Parties

The DOL Regulation requires disclosure of compensation that will be paid among Mutual of America, its affiliates, and subcontractors in connection with the services described above, if such compensation is charged on a transaction basis, or is charged directly against the covered plan's investment and reflected in the net value of the investment. The DOL Regulation requires separate disclosure of this information even though **this compensation is part of – and not in addition to – the compensation already reported in this Section.** Examples of this type of compensation that are provided in the DOL Regulation include agent or broker commissions, finder's fees, or other similar incentive compensation, and annual marketing or distribution fees sometimes paid by mutual fund companies to third-party investment platform providers (*i.e.*, Rule 12b-1 fees).

With respect to compensation charged on a transaction basis, Mutual of America does not utilize a commissioned sales force, nor do we have independent agents acting as brokers. Our sales and marketing units are completely comprised of salaried employees of the Company. Compensation of its employees by the service provider need not be disclosed under the DOL Regulation. The Company does provide compensation and fee information on an annual basis that is required to be included on your Plan's Form 5500. With respect to compensation that is charged directly against the Plan's investment and reflected in the net value of the investment, we have described the Separate Account expenses above. No additional fees, such as Rule 12b-1 fees, are deducted from and affect the unit value of the Separate Accounts or the underlying funds. The subsidiaries of Mutual of America (which are our "affiliates" under the DOL's definition of that term) have entered into service agreements with Mutual of America, and under one such service agreement Mutual of America Capital Management LLC, the investment adviser for the affiliated funds, receives certain accounting, finance and other administrative services from

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Mutual of America and are part of the operating expense of each fund as described above. Expenses equal to the cost of such services to Mutual of America are allocated to the investment adviser by Mutual of America. These expense allocations are neither transaction-based nor deducted from and reflected in the unit value of the Separate Accounts. No profit or additional fees are charged beyond the cost of the services rendered.

With respect to compensation paid to subcontractors in connection with the services described above, the Company pays an unaffiliated bank an account maintenance fee equal to approximately 0.25% of the average daily balance of unallocated amounts for all activity including, but not limited to, premium/contribution transactions pending settlement and on disbursements between the date of the deduction from the plan fund and the date of receipt by the payee (depositing the check or electronic deposit).

E. Termination-Related Compensation

There are no charges, fees, or expenses for Contract or plan termination.

III. RECORDKEEPING DISCLOSURE

The DOL Regulation requires separate disclosure of the portion of our total compensation we expect to receive that is attributable to recordkeeping services (refer to Section I.B, above, for a description of Recordkeeping Services we provide to your Plan). Since we do not specifically charge or itemize a separate price for recordkeeping services, we must, according to the DOL Regulation, provide a reasonable and good-faith estimate of the cost to your Plan of recordkeeping services, an explanation of the methodology and assumption we used to prepare the estimate, and a detailed explanation of the recordkeeping services that will be provided to your Plan.

The recordkeeping costs are included in the fees listed above.

The specific recordkeeping services we provide are listed in detail in Section I.B, above. Those services, in general, cost 0.22% of your Plan's investment in the Contract funding your Plan. **This compensation is part of – and not in addition to – the compensation already reported in Section II, above.** The DOL Regulation requires separate disclosure of this amount, notwithstanding the fact that recordkeeping services have already been discussed elsewhere in this document.

The estimated recordkeeping charge was derived by determining a budget allocation for each department in the Company responsible for providing one or more of the enumerated recordkeeping services. That figure is then validated and benchmarked against the explicit fees charged by other third-party service providers, and is converted into an estimated charge against the total investment of your Plan in the Contract.

IV. MANNER IN WHICH COMPENSATION IS RECEIVED

- A) Employer paid charges are paid directly by the employer as billed. As previously noted, these charges are not required by the DOL Regulation to be disclosed but are included here for your information.

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- B) Direct compensation is received in the following ways:
1. Forfeiture processing charges are deducted from the non-vested account balance of participants who terminate employment.
 2. Participant's administrative charges are deducted from the participant's account.
 3. For trustee loans, non-refundable loan origination and maintenance fees are received by deducting the fees from the amount of the loan disbursement. For collateralized loans, loan maintenance fees are assessed by means of an interest difference between the credited rate of the collateral amount and the loan interest rate charged. Additionally, loan interest and any late fees are received from the Plan participant.
- C) Indirect compensation is received as a result of the following:
1. All Separate Account expenses are received by a deduction from the value of the net assets on each valuation day. Performance statements are displayed net of these deductions. These charges are included in the operating expenses listed in the table above.
 2. Money held due to time lags attributable to benefit payments earns interest in Company investments and is retained in its general fund.
 3. Money received from external funds is received in direct payments (and paid in full to participants).
 4. Investment of funds allocated to the Interest Accumulation Account.
- D) Compensation among related parties is received through internal charges and a payment system is not involved due to the fact that the related parties are subsidiaries. There are no other related parties such as other advisers, brokers or dealers.

V. INVESTMENT DISCLOSURE

Pursuant to the DOL Regulation, the Company must provide you with the investment-related disclosure information that is part of the participant-level fee disclosure required by DOL Regulation 29 C.F.R. 2550.404a-5(d) (1). Therefore, in conjunction with this Fee Disclosure and Important Notice, we have also provided the Participant Annual Fee Disclosure Notice which contains this investment-related disclosure information.

