



Verification Report

Ms. Sumali Sanyal, CFA
Executive Vice President & Chief Operating Officer
Piedmont Investment Advisors, Inc.

We have verified whether Piedmont Investment Advisors, Inc. (the "Firm") (1) has complied with all the composite construction requirements of the Global Investment Performance Standards (GIPS®) on a firm-wide basis for the periods from January 1, 2017 through September 30, 2018, and (2) designed its policies and procedures to calculate and present performance in compliance with the GIPS standards as of September 30, 2018. The Firm's management is responsible for compliance with the GIPS standards and the design of its policies and procedures. Our responsibility is to express an opinion based on our verification. We conducted this verification in accordance with the required verification procedures of the GIPS standards. We also conducted such other procedures as we considered necessary in the circumstances.

In our opinion, the Firm has, in all material respects:

- Complied with all the composite construction requirements of the GIPS standards on a firm-wide basis for the periods from January 1, 2017 through September 30, 2018; and
- Designed its policies and procedures to calculate and present performance in compliance with the GIPS standards as of September 30, 2018.

A verification covering the periods from October 1, 2000 through December 31, 2016 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

Prior to August 31, 2018, the firm was known as Piedmont Investment Advisors, LLC.

This report does not relate to or provide assurance on any composite compliant presentation of the Firm and does not ensure the accuracy of any specific composite compliant presentation.

ACA Performance Services, LLC

ACA Performance Services, LLC
January 8, 2019

PIEDMONT INVESTMENT ADVISORS, LLC
OPTIMIZED SMID CORE COMPOSITE
ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (millions)	Composite Assets		Annual Performance Results				Annualized Std. Deviation	
		USD (millions)	Number of Accounts	Composite Gross	Composite Net	Russell 2500 Benchmark	Composite Dispersion	Composite 3 year	Benchmark 3 Year
2018	4,026	0.14	Five or fewer	-7.99%	-8.26%	-10.00%	N.A.	14.84%	14.10%
2017	6,817	100.4	Five or fewer	23.51%	23.01%	16.81%	N.A.	12.05%	12.13%
2016	6,249	35.8	Five or fewer	17.46%	17.04%	17.59%	N.A.	13.07%	13.67%
2015	5,577	0.1	Five or fewer	-2.02%	-2.33%	-2.90%	N.A.	12.17%	12.42%
2014	2,542	0.1	Five or fewer	11.25%	10.87%	7.07%	N.A.	11.62%	11.67%
2013	2,731	0.2	Five or fewer	39.09%	38.62%	36.80%	N.A.	15.75%	15.63%
2012	3,425	0.2	Five or fewer	22.29%	21.99%	17.88%	N.A.	18.80%	19.24%
2011	3,441	5.0	Five or fewer	0.52%	0.30%	-1.73%	N.A.	22.11%	22.16%
2010	3,449	5.0	Five or fewer	23.74%	23.46%	26.64%	N.A.	N.A.	N.A.
2009	N.A.	4.0	Five or fewer	38.09%	37.75%	37.38%	N.A.	N.A.	N.A.
2008	N.A.	3.0	Five or fewer	-37.98%	-38.13%	-36.23%	N.A.	N.A.	N.A.

N.A. - Information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire year.

Performance presented prior to December 15, 2010 occurred while the Portfolio Management Team was affiliated with a prior firm and the Portfolio Management Team members were the only individual(s) responsible for selecting the securities to buy and sell. Piedmont Investment Advisors maintains all of the books and records to support the historical performance.

The 3-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. Standard deviation is not required for periods prior to 2011.

***Optimized SMID Core Composite** contains fully discretionary SMID core equity accounts and for comparison purposes is measured against the Russell 2500 Index. The product typically has fewer than 100 holdings and a predicted tracking error target range of 5% - 8% vs. Russell 2500 using the Barra US Equity Risk Model. The Optimized SMID Core Composite was created on December 15, 2010. The Optimized SMID Core Composite's inception date is 10/31/07. This composite was renamed on September 30, 2012 to better reflect the true strategy of the product. Formerly, the composite was named "Optimized Mid Cap Core vs. S&P Midcap Composite". This composite changed its benchmark on September 30, 2012 from the S&P Midcap to the Russell 2500 because the latter benchmark better represents the investable universe of the product.*

Piedmont Investment Advisors, LLC claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Piedmont Investment Advisors, LLC has been independently verified for the periods October 1, 2000 through September 30, 2018. A copy of the verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.

Piedmont Investment Advisors, LLC is an independent investment adviser registered with the SEC. The firm maintains a complete list and description of composites, which is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Past performance is not indicative of future results.

The U.S. Dollar is the currency used to express performance. Returns are presented gross and net of management fees and include the reinvestment of all income. Net of fee performance was calculated using actual management fees. The annual composite dispersion presented is an asset-weighted standard deviation calculated for the accounts in the composite the entire year. Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule for the composite is as follows:

Product	First \$10M	Next \$15M	Next \$25M	Next \$25M	Next \$25M	Over \$100M
Optimized SMid Core	85 BPS	80 BPS	75 BPS	70 BPS	65 BPS	60 BPS

Fees are charged to clients on a quarterly basis. Fees are calculated as a percentage of assets under management and vary based upon the type of product and the total amount of assets under management. The percentage fee is expressed terms of basis points ("BPS") for our products. One hundred basis points equal 1%. All fees are negotiable.