



## 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**  
**CORE VALUE COMPOSITE**  
**ANNUAL DISCLOSURE PRESENTATION**

Year End	Total Firm Assets (millions)	Composite Assets			Annual Performance Results				Annualized Std. Deviation	
		USD (millions)	Number of Accounts	% Bundled Fee	Composite Gross	Composite Net	S&P 500	Composite Dispersion	Composite 3 year	S&P 500 3 year
2018	4,026	6.2	Five or Fewer	0%	-5.81%	-6.21%	-4.38%	N.A.	10.55%	10.80%
2017	6,817	7.0	Five or Fewer	0%	20.94%	20.39%	21.83%	N.A.	9.68%	9.92%
2016	6,249	6.0	Five or Fewer	0%	16.60%	16.09%	11.96%	N.A.	10.36%	10.59%
2015	5,577	5.0	6	0%	1.61%	1.16%	1.38%	0.33	10.32%	10.47%
2014	2,542	4.0	6	0%	13.48%	12.97%	13.69%	0.36	N.A	N.A
2013	2,731	3.63	6	0%	38.42%^	37.01%	32.39%	N.A	N.A	N.A
2012*	3,425	0.13	Five or Fewer	100%	0.04%^	-0.40%	-0.38%	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.

\*Results shown for the year 2012 represent partial period performance from October 1, 2012 through December 31, 2012.

^Gross of fees Performance for the period September 30, 2012 to September 30, 2013 is supplemental information. During that period, one account in the composite had a bundled fee. The net performance for that period is reduced by the total bundled fee, which is comprised of the custodial fee and transactions costs, plus Piedmont's management fee. Standard deviation is not shown for the composite prior to 2015 because 36 calendar monthly returns are not available.

*The 3-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period.*

***Core Value Composite** contains fully discretionary equity income accounts and for comparison purposes is measured against the S&P 500 Index. The product typically has between 35 and 45 holdings and a current yield that is greater than the S&P 500. The Core Value product was created on September 30, 2012.*

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. During the period September 30, 2012 to September 30, 2013, net of performance was calculated by reducing the gross of fees performance by the entire bundled fee of 1.50%, which is comprised of the custodial fee and transaction costs, plus Piedmont's management fee. 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 \$25M	Next \$25M	Next \$50M	Over \$100M
Core Value	50 BPS	45 BPS	40 BPS	37.5 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.

Effective April 1, 2016, Composite name was changed from Growth & Income to Core Value.