



Symetra

Spinnaker® Variable Annuity

Spinnaker® Plus Variable Annuity

This disclosure statement contains information about the Symetra Spinnaker Variable Annuity and Spinnaker Plus Variable Annuity products and services that Symetra Life Insurance Company (Symetra Life, we, us, our) provides to your retirement plan in connection with the product. This disclosure statement is not intended to replace the Contract issued to you or your participants. In the event of conflict between the Contract and this disclosure statement, the Contract shall control. This information is designed to help you fulfill your duty as a plan fiduciary in accordance with Section 408(b)(2) of the Employee Retirement Income Security Act of 1974 (ERISA). This statement contains the following: the Recordkeeping Services we provide; our Direct and Indirect Fees; and Payments to Financial Professionals.

Recordkeeping Services

The product has a separate account that invests in an array of mutual funds all of which are segregated Sub-accounts of the separate account. In addition, as an insurance company, we are also able to offer the Symetra Life Fixed Account. The fixed account provides a guarantee of principal with a fixed interest rate. This account is an investment in the general account of Symetra Life and is not segregated from Symetra Life's other assets.

Your plan allows your participants to direct the investment of their own contributions into the available Sub-accounts. The product allows your participants to direct the investment of their own contributions subject to the plan's authorization. Your participants give us instructions on how to invest their contributions based on the options available. Recordkeeping Services are provided in connection with offering the product. The following services are provided where allowed by the plan and by governing Internal Revenue Service and Department of Labor regulations. Some services require Plan Administrator authorization.

Allocating Forfeitures	Investment accounting,
Benefit elections at separation from service	inter-account transfers,
Call Center Services, including toll-free phone and fax services	investment tracking, account balances, daily unit values, investment options, allocations.
Case Statements (to Plan Administrator)	Loan processing
Change of address	Participant Name Changes
Change of beneficiary	Confirmations of Account Activity
Change of servicing agent	Partial Withdrawals
Change of investment selection	Participant Statements (quarterly and annual)
Death Claims	Required Minimum Distributions
Direct and Indirect Rollovers	Social Security number changes
Domestic relations orders	Preparation of 1099s for distributions from product
Form 5500 information provided to plan	Transfer from one investment to another
Full Withdrawals	Website access at www.symetra.com/OnlineAccess
Fund level information	

Symetra Life, through our separate account, offers investment options that invest in mutual funds that are unaffiliated with Symetra Life. We execute trades on behalf of your plan with those mutual funds based on your plan and/or your participants' instructions. By providing these services, this eliminates the cost of engaging another party to perform these services. We also act as an agent on the daily trading of these funds through our separate accounts. As a result, we may receive 12b-1 and sub-transfer agency ("Sub-TA") fees for performing these services. While these fees are retained by Symetra Life, or its broker-dealer affiliate, Symetra Securities, Inc., they are considered in our pricing. For the specific fee amounts, please see the Investment Options Table below. The Investment Options Table below details a reasonable estimate of the fees we receive in the form of 12b-1 or Sub-TA fees paid to us expressed as a percentage of the assets invested in that investment option.

We are not a plan fiduciary under ERISA. You are responsible for selecting this product, including its plan lineup. Your plan participants select their own investment options and Symetra Life has no discretion over this process. Additionally, we carry out administrative and Recordkeeping Services based on your direction as the plan's fiduciary. We are not a registered investment adviser.

Direct and Indirect Compensation

For all of the services described above, Symetra Life's compensation includes the following direct contract-level charges and indirect compensation. All compensation described in this section is integral to the total compensation received by Symetra Life for all Recordkeeping Services described above. No individual source of revenue should be considered in isolation with respect to a single service.

Direct Compensation from Contract Charges

The following Contract-level charges are paid directly by each Contractholder to Symetra Life:

Annual Administration Maintenance Charge (Spinnaker Contracts Only): \$30 each Contract Year. The charge is waived if the Contract Value is \$50,000 or more. Generally, the charge will never be more than \$35 for Contracts issued in 2005 or earlier, and no more than \$50 for those Contracts issued thereafter. Please consult your Contract for details.

Asset-Related Administration Maintenance Charge of 0.15% (Spinnaker Contracts Only). Equal on an annual basis to 0.15% of the average daily net asset value of each Sub-account.

Contingent Deferred Sales Charge: 8-year decreasing schedule (Spinnaker Contracts Only) 8%, 7%, 6%, 5%, 4%, 3%, 2%, 1%. The charge is a percentage of the amount withdrawn. Participants may withdraw 10% of their Contract Value, per Contract Year, without being assessed a contingent deferred sales charge.

Mortality & Expense Risk Charge: 1.25%. Equal on an annual basis to 1.25% of the average daily net asset value of each Sub-account.

Transfer Charge: \$10 or 2% of the amount transferred, whichever is less, for each transfer after the 12th transfer in a Contract Year.

Withdrawal Charge: \$25 or 2% of the amount withdrawn, whichever is less, for each withdrawal after the first withdrawal in a Contract Year.

For any loans taken against the Contract Value, the loan net interest rate is an annual rate of 2.5% of the loan amount.

Indirect Compensation

For investment-related indirect fee information as of the date of this disclosure document, please see the Investment Options Table below. In our role as distributor and transfer agent for the investment options under the Contract, Symetra Life or its affiliate, Symetra Securities, Inc., may receive distribution (12b-1 fees) from the funds that are investment options under the Contract and Sub-TA/recordkeeping/administration fees from the investment company (or its affiliate) for plan assets invested in the investment option. Symetra Life only offers mutual funds in the product that are unaffiliated with us; we do not collect any Portfolio-level investment management fees. The investment management fees and other fees deducted from the investment option by the mutual fund company are equal to the amounts shown in the separate disclosure statements we provide you for compliance with the Department of Labor's 404a-5 regulation under ERISA. Data for unaffiliated funds is obtained from sources external to us. We cannot guarantee the accuracy, completeness or timeliness of this data.

Symetra Life's compensation will also include the following elements:

1. any investment gains resulting from Symetra Life's trading errors or other share or unit value discrepancies. Symetra Life will keep any gains and absorb any losses derived from re-processing transactions due to our trading errors. If such re-processing results in a loss, Symetra Life will make the plan and plan participants whole.
2. earnings (*i.e.*, "float income") on funds received, or credited to the Contract, before they are invested, allocated or applied in accordance with allocation instructions from the plan; or funds transferred from your Contract and held in Symetra Life's general account before actual disbursements are made from the general account. For more information about float income, please contact us for details.
3. varying amounts of revenue from the Symetra Life Fixed Account. The amount of revenue varies based on the spread (if any) between the net earned rate of Symetra Life's general account investments and interest rates credited for the Symetra Life Fixed Account. If there is no spread, we bear the risk of loss for crediting the guaranteed minimum interest rate we credit to the Symetra Life Fixed Account shown in your Contract.

All of the indirect compensation we receive helps Symetra Life offset the costs of providing you the Recordkeeping Services described in this disclosure statement.

Investment Option Table

Investment Option	Compensation	
	12b-1 Fees ¹	Sub-TA and Service Fees ²
The shaded Investment Options are only available to Spinnaker Contractholders.		
American Century VP Balanced Fund Class I	N/A	0.25%
American Century VP Inflation Protection Fund Class II	0.25%	0.15%
American Century VP International Fund Class I	N/A	0.25%
American Century VP Large Company Value Fund Class II	0.25%	0.25%
American Century VP Ultra Fund Class I*	N/A	0.25%
American Century VP Ultra Fund Class II	0.25%	0.25%
American Century VP Value Fund Class I	N/A	0.25%
Calvert VP EAFE International Index Portfolio – Class F	0.20%	0.15%
Calvert VP Investment Grade Bond Index Portfolio – Class I	N/A	0.15%
Calvert VP Nasdaq – 100 Index Portfolio – Class I	N/A	0.15%
Calvert VP Russell 2000 Small Cap Index Portfolio – Class F	0.20%	0.15%
Calvert VP S&P MidCap 400 Index Portfolio – Class F	0.20%	0.15%
Calvert VP SRI Balanced Portfolio – Class I	N/A	0.15%
Dreyfus IP MidCap Stock Portfolio – Initial Shares*	N/A	0.30%
Dreyfus IP Technology Growth Portfolio – Initial Shares	N/A	0.30%
The Dreyfus Sustainable U.S. Equity Portfolio, Inc. – Initial Shares	N/A	0.30%
Dreyfus Stock Index Fund, Inc – Service Shares	0.25%	0.10%
Dreyfus VIF Appreciation Portfolio – Initial Shares*	N/A	0.30%
Dreyfus VIF Quality Bond Portfolio – Initial Shares*	N/A	0.30%
DWS Capital Growth VIP – Class B	0.25%	0.25%
DWS CROCI® International VIP – Class A	N/A	0.25%
DWS Global Income Builder VIP – Class A*	N/A	0.25%
DWS Global Small Cap VIP – Class B	0.25%	0.25%
DWS International Growth VIP – Class B	0.25%	0.25%
Federated High Income Bond Fund II – Primary Shares*	N/A	0.25%
Federated Managed Volatility Fund II – Primary Shares*	N/A	0.25%
Fidelity VIP Asset Manager Portfolio – Initial Class*	N/A	0.05% ³
Fidelity VIP Contrafund Portfolio – Initial Class	N/A	0.05% ³
Fidelity VIP Equity-Income Portfolio – Initial Class	N/A	0.05% ³
Fidelity VIP Freedom 2010 Portfolio – Service Class 2	0.25%	0.05% ³
Fidelity VIP Freedom 2015 Portfolio – Service Class 2	0.25%	0.05% ³
Fidelity VIP Freedom 2020 Portfolio – Service Class 2	0.25%	0.05% ³
Fidelity VIP Freedom 2025 Portfolio – Service Class 2	0.25%	0.05% ³
Fidelity VIP Freedom 2030 Portfolio – Service Class 2	0.25%	0.05% ³
Fidelity VIP Freedom Income Portfolio – Service Class 2	0.25%	0.05% ³
Fidelity VIP Government Money Market Portfolio – Service Class 2	0.25%	N/A
Fidelity VIP Growth & Income Portfolio – Initial Class	N/A	0.05% ³
Fidelity VIP Growth Opportunities Portfolio – Initial Class*	N/A	0.05% ³
Fidelity VIP Growth Portfolio – Initial Class*	N/A	0.05% ³
Fidelity VIP Mid Cap Portfolio – Service Class 2	0.25%	0.05% ³
Fidelity VIP Overseas Portfolio – Service Class 2	0.25%	0.05% ³
Franklin Flex Cap Growth VIP Fund – Class 2	0.25%	0.10%
Franklin Founding Funds Allocation VIP Fund – Class 2	0.25%	0.10%
Franklin Income VIP Fund – Class 2	0.25%	0.10%
Franklin Mutual Shares VIP Fund – Class 2	0.25%	0.10%
Franklin Small Cap Value VIP Fund – Class 2	0.25%	0.10%
Franklin Small-Mid Cap Growth VIP Fund – Class 2	0.25%	0.10%
Franklin U.S. Government Securities VIP Fund – Class 2	0.25%	0.10%
Invesco V.I. American Franchise Fund (Series I Shares)*	N/A	0.15% ⁴
Invesco V.I. American Franchise Fund (Series II Shares)	0.25%	0.15% ⁴
Invesco V.I. Global Real Estate Fund (Series I Shares)*	N/A	0.15% ⁴

Investment Option Table

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The shaded Investment Options are only available to Spinnaker Contractholders.		
Invesco V.I. Health Care Fund (Series I Shares)*	N/A	0.15% ⁴
Invesco V.I. International Growth Fund (Series I Shares)*	N/A	0.15% ⁴
Invesco V.I. International Growth Fund (Series II Shares)	0.25%	0.15% ⁴
Invesco V.I. Mid Cap Growth Fund (Series I Shares)*	N/A	0.15% ⁴
Invesco V.I. Mid Cap Growth Fund (Series II Shares)	0.25%	0.15% ⁴
Invesco V.I. Small Cap Equity Fund (Series II Shares)	0.25%	0.15% ⁴
JPMorgan Insurance Trust Mid Cap Value Portfolio – Class 1 Shares	N/A	0.25%
JPMorgan Insurance Trust U.S. Equity Portfolio – Class 1 Shares*	N/A	0.25%
Morningstar Aggressive Growth ETF Asset Allocation Portfolio – Class II	0.25%	0.125% ⁵
Morningstar Balanced ETF Asset Allocation Portfolio – Class II	0.25%	0.125% ⁵
Morningstar Conservative ETF Asset Allocation Portfolio – Class II	0.25%	0.125% ⁵
Morningstar Growth ETF Asset Allocation Portfolio – Class II	0.25%	0.125% ⁵
Morningstar Income and Growth ETF Asset Allocation Portfolio – Class II	0.25%	0.125% ⁵
Neuberger Berman AMT Guardian Portfolio – Class S	0.25%	0.25%
Neuberger Berman AMT Mid Cap Growth Portfolio – Class S	0.25%	0.25%
Neuberger Berman AMT Mid Cap Intrinsic Value Portfolio – Class S	0.25%	0.25%
PIMCO All Asset Portfolio – Advisor Class	0.25%	0.10%
PIMCO CommodityRealReturn Strategy Portfolio – Administrative Class	N/A	0.25%
Pioneer Bond VCT Portfolio – Class I Shares*	N/A	N/A
Pioneer Equity Income VCT Portfolio – Class II Shares	0.25%	0.25%
Pioneer Fund VCT Portfolio – Class I Shares*	N/A	N/A
Pioneer High Yield VCT Portfolio – Class II Shares	0.25%	0.25%
Pioneer Mid Cap Value VCT Portfolio – Class I Shares	N/A	N/A
Pioneer Real Estate Shares VCT Portfolio – Class II Shares	0.25%	0.25%
Pioneer Select Mid Cap Growth VCT – Class I Shares*	N/A	N/A
Pioneer Strategic Income VCT Portfolio – Class II Shares	0.25%	0.25%
Templeton Developing Markets VIP Fund – Class 2	0.25%	0.10%
Templeton Global Bond VIP Fund – Class 2	0.25%	0.10%
Templeton Growth VIP Fund – Class 2	0.25%	0.10%
Voya Global Equity Portfolio – Class S*	0.25%	0.25%
VY JPMorgan Emerging Markets Equity Portfolio – Class I*	N/A	0.25%

¹ 12b-1 Fees are paid to us by the investment company (or its affiliate) to offset our distribution and marketing expenses and shareholder costs.

² Sub-transfer agency and service agreement fees remitted to us by the investment company (or its affiliate) offset the cost of Recordkeeping Services associated with administering plan and individual participant accounts.

³ In any calendar quarter, if Symetra Life assets are under \$100 million invested in the Fidelity VIP Portfolios excluding the Government Money Market Portfolio, Symetra Life may receive no compensation. For assets over \$100 million but under \$125 million, Symetra Life receives 0.05% of the average net assets invested in the Fidelity VIP Portfolios excluding the Government Money Market Portfolio. Symetra Life receives 0.10% of the average net assets in excess of \$125 million invested in the Fidelity VIP Portfolios excluding the Government Money Market Portfolio.

⁴ Symetra Life receives 0.25% of the average net assets in excess of \$100 million invested in Invesco Portfolios. For assets under \$100 million and above \$50 million, Symetra Life receives 0.20% of the average net assets. For assets under \$50 million, Symetra Life receives 0.15% of the average net assets. Effective October 1, 2016, Symetra Life will receive 0.15% of the average net assets and will no longer receive higher amounts for higher balances.

⁵ Symetra Life receives 0.20% of the average net assets amounting to \$2.5B or more invested in Morningstar Portfolios. For assets amounting to \$1B - \$2.249B, Symetra Life receives 0.175% of the average net assets. For assets amounting to \$250M - \$999M, Symetra Life receives 0.15% of the average net assets. For assets under \$250M, Symetra Life receives 0.125% of the average net assets.

* **Restricted Portfolios.** These Portfolios are open to investors who have been continuously invested in them. However, if they ever reach a zero balance, regardless of how the zero balance occurred (through withdrawals, repetitive payments, transfers, loans, etc), the investment option will no longer be available for future investments.

Payments to Sales Agents

As the plan fiduciary, you purchased our Contract through a sales agent who is registered with a broker-dealer. The agent's responsibilities included providing you information about the Contract. Symetra Life has sold the Contract through the agent who is licensed by the state and appointed by Symetra Life to sell the Contract. The agent's broker-dealer/supervising agency is compensated for services through a sales commission. It is the broker-dealer's responsibility to pay the agent.

The sales commissions that we pay for the sale of the Contract, and which you pay indirectly through our fees, are reflected in the Schedule A of your Form 5500. Please contact us or your agent for information regarding the exact amount of the commission we pay on the sale of your Contract.



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