



Symetra Group Variable Annuity

This disclosure statement contains information about the Symetra Group Variable Annuity product 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 and Certificates issued to your participants under the Contract. 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 portfolios. 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	Fund level information
Benefit elections at separation from service	Investment accounting, including
Call Center Services, including toll-free phone and fax services	enrolling participants, inter-account transfers,
Case Statements (to Plan Administrator)	investment tracking, account balances, daily unit
Change of address	values, investment options, allocations.
Change of beneficiary	Loan processing
Change of servicing agent	Participant Name Changes
Change of investment selection	Partial Withdrawals
Confirmations of Account Activity	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

Symetra Life, through our separate account offered under the product, 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 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'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 participant or the Contractholder to Symetra Life:

Annual Administrative Maintenance Fee: \$30 each calendar year not to exceed \$35 (currently waived).

Asset Charge: The charge is 1.40% of the daily net asset value of the accumulation unit for each "Portfolio" under the contract on an annual basis. The charge may be reimbursed in part to participant accounts. Contact your sales agent or us for details. (This charge does not apply to investments in the Fixed account.)

In some contracts, the Asset Charge is comprised of a Mortality and Expense Risk charge equal on an annual basis to 1.25% of the daily net asset value of the sub-account and the Asset Related Administration Charge equal on an annual basis to .15% of the average daily net asset value of the Separate Account. Check your Contract for details.

Contingent Deferred Sales Charge (CDSC): The charge is a declining percentage over a specified period of years of the amount withdrawn from the participant's accumulation account or Contract holder's accumulation account. This charge may vary or may not be applicable to your Contract. See your Contract for details.

Notwithstanding whether your Contract was sold with a CDSC schedule, your Plan and participants have no further CDSC charges for withdrawals because your Contract's anniversary is past the last Contract year in which Symetra Life would charge a CDSC under the terms of your Contract.

Market Value Adjustment (MVA): equal to net investment loss. The adjustment applies to Transfers and Withdrawals in excess of 10% of the Contract holder's and participant's Fixed Account value per Certificate Year, when the current interest rate (credited to new Purchase Payments) is more than the interest rate being credited to the funds transferred or withdrawn. There is no market value adjustment for participant-initiated events such as termination of employment, in-service distributions, loans, financial hardship, disability or death. For a complete list of participant-initiated events, please see your Contract. (The MVA applies only to investments in the Symetra Fixed Account.)

Transfer Charge: \$10 for any transfer after the first 12 transfers in a calendar year (currently waived).

Withdrawal Charge: \$25 for each withdrawal after the first withdrawal in a Certificate Year (currently waived).

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 or its affiliate, Symetra Securities, Inc., may receive distribution (12b-1 fees) from the funds that are investment options under the contract and sub-transfer agency/recordkeeping fees/administration 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's compensation will also include the following elements:

1. any investment gains resulting from Symetra's trading errors or other share or unit value discrepancies. Symetra 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 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 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 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 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	Compensation	
	12b-1 Fees ¹	Sub-TA and Service Fees ²
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 II	0.25%	0.25%
American Century VP Ultra® Fund Class I*	N/A	0.25%
American Century VP Value Fund Class I	N/A	0.25%
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 CROCI® International VIP – Class A*	N/A	0.25%
DWS Global Income Builder VIP – Class A*	N/A	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 Government Money Market Portfolio – Service Class 2	N/A	0.05% ³
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	0.25%	0.05% ³
Fidelity VIP Mid Cap Portfolio – Service Class 2	0.25%	N/A
Franklin Flex Cap Growth 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
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
JPMorgan Insurance Trust Mid-Cap Value Portfolio – Class I Shares	N/A	0.25%
JPMorgan Insurance Trust U.S. Equity Portfolio – Class I Shares*	N/A	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 Select Mid Cap Growth VCT Portfolio – 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 daily net assets and will no longer receive higher amounts for higher balances.
- * **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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