S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds)

i. Does the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) reference 25 or more component securities (whether or not the security is an underlying security)?

As of Jan. 3, 2023, the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) consisted of two underlying index components, the S&P U.S. Dividend Growers Index and S&P 10-Year U.S. Treasury Note Futures Index values.

ii. Does the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) reference long positions only?

Yes, the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) references long positions only.

iii. Does the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) include any component underlying securities that represent more than 15% of the weight of the component securities in the index?

As of Jan. 3, 2023, the largest constituent in the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) was the underlying bond index component, which represented about 86.68% of the weight of the overall index.

iv. Does the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) include five or fewer component underlying securities that together represent more than 40% of the weight of the component securities in the index?

As of Jan. 3, 2023, the cumulative weight of the equity index component in the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) represented 16.50% of the overall index weight.

v. Is the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) modified or rebalanced only according to publicly stated, predefined criteria, which may require interpretation by the index provider or a board or committee responsible for maintaining the index?

The S&P Risk Control 2.0 Indices Methodology document describes the criteria for managing the index and includes the rules for asset weight determination and index calculation.

vi. Is the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) referenced by futures contracts or options contracts that trade on a national securities exchange that is registered with the Securities and Exchange Commission or a domestic board of trade that is designed as a contract market by the Commodity Futures Trading Commission (regardless of whether the contracts provide price only or total return exposure to the index or provide for dividend reinvestment in the index)?

As of Jan. 3, 2023, the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) was not referenced by futures contracts or options contracts.
vii. Did the S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) provide an annual dividend yield in the immediately preceding calendar year from component underlying securities that is greater than 1.5 times the annual dividend yield of the S&P 500® as reported for the immediately preceding calendar year?

The S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) is composed of underlying equity and bond index components but not individual securities. Therefore, we cannot conclude that the index provided an annual dividend yield in the immediately preceding calendar year from component underlying securities that is greater than 1.5 times the annual dividend yield of the S&P 500.

The S&P U.S. Dividend Growers VA RC2 7.5% Index (Fed Funds) is based on one or more underlying indices, for which asset allocation and index level calculation use a specified set of rules as specified on S&P Risk Control 2.0 Indices Methodology document.

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