

**Best Interest Contract Exemption Commission Account  
Conflicts of Interest Matrix**

Products	Compensation Description	Neutral Factors
New Issue CDs (Various Maturities)	<u>Transaction Based Commission:</u> 0.00%-3.00%	<u>Pre-transaction:</u> client profile, portfolio review, CD research including risks assessment, suitability determination <u>Transaction:</u> order entry, best execution review, processing and confirmation <u>Ongoing:</u> semi-annual account review. Oppenheimer completes ongoing due diligence of CD offerings. FDIC limits are reviewed and evaluated as part of pre-transaction review. Various potential risks are reviewed, including market, interest rate, credit, inflation, and liquidity.
Secondary Issue CDs (Various Maturities)	<u>Transaction Based Commission:</u> 0.00% - 2.95%; subject to a \$75 minimum commission	<u>Pre-transaction:</u> client profile, portfolio review, CD research including risks assessment, suitability determination <u>Transaction:</u> order entry, best execution review, processing and confirmation <u>Ongoing:</u> semi-annual account review. Oppenheimer completes ongoing due diligence of CD offerings. FDIC limits are reviewed and evaluated as part of pre-transaction review. Various potential risks are reviewed, including market, interest rate, credit, inflation, and liquidity.

Products	Compensation Description	Neutral Factors
Equity UITs 2-year Maturity	<u>Transaction Based Commission:</u> 2.00% - 3.15% <u>Volume</u> <u>Concession:</u> 0.00% - 0.175% <u>Marketing and Education</u> <u>Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, portfolio review, UIT research including a comprehensive UIT holdings review and risks assessment, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account review, UIT portfolio review. Ongoing UIT due diligence is completed semi-annually. Trades are reviewed daily.
Fixed Income UITs Various Maturities	<u>Transaction Based Commission:</u> 1.10%-3.25% Volume <u>Concession:</u> 0.00% - 0.175% <u>Marketing and Education</u> <u>Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, portfolio review, UIT research including a comprehensive UIT holdings review and risks assessment, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account review, UIT portfolio review. Ongoing UIT due diligence is completed semi-annually. Trades are reviewed daily.

Products	Compensation Description	Neutral Factors
Equity UITs 1-year Maturity	<u>Transaction Based Commission:</u> 1.25% - 2.25% <u>Volume</u> <u>Concession:</u> 0.00% - 0.175% <u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, portfolio review, UIT research including a comprehensive UIT holdings review and risks assessment, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account review, UIT portfolio review
General Securities Transactions: Equities, Warrants/Rights, MLPs, and GDRs	Refer to General Securities Transaction Description A	<u>Pre-transaction:</u> client profile, portfolio review, security research, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review
Exchange Traded Funds (ETFs)	<u>Transaction Based Compensation:</u> Refer to General Securities Transaction Description A <u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, portfolio review, fund research, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review

Products	Compensation Description	Neutral Factors
Closed End Funds (CEFs)	Refer to General Securities Transaction Description A	<u>Pre-transaction:</u> client profile, fund research including NAV discount review, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review
General Securities Transactions: fixed income and preferred stocks	Refer to General Securities Transaction Description B	<u>Pre-transaction:</u> client profile, portfolio review, security research, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review
Single Premium Immediate Annuity	<u>Deposit Based Commission:</u> 3.50% <u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, suitability determination <u>Transaction:</u> order entry, processing and confirmation

Products	Compensation Description	Neutral Factors
Fixed Annuity Purchase	<u>Deposit Based Commission:</u> 2.00% <u>Marketing and Education</u> <u>Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, suitability determination <u>Transaction:</u> order entry, processing and confirmation
Deferred Income Annuity	<u>Deposit Based Commission:</u> 3.50% <u>Marketing and Education</u> <u>Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, suitability determination <u>Transaction:</u> order entry, processing and confirmation

Products	Compensation Description	Neutral Factors
Fixed Indexed Annuities	<u>Deposit Based Commission:</u> 3.50% <u>Annual Asset Based Commission:</u> 0.25% <u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, fund research, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review, performance monitoring, reporting
Variable Annuities	<u>Deposit Based Commission:</u> 5.00% <u>Annual Asset Based Commission:</u> 0.50% <u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, fund research, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review, performance monitoring, reporting

Products	Compensation Description	Neutral Factors
Variable Annuities	<u>Deposit Based Commission:</u> 3.50% <u>Annual Asset Based Commission:</u> 0.75% <u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, fund research, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> quarterly account and investment review, performance monitoring, reporting
Variable Annuities	<u>Deposit Based Commission:</u> 2.00% <u>Annual Asset Based Commission:</u> 1.00% <u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy	<u>Pre-transaction:</u> client profile, fund research, suitability determination <u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> monthly account and investment review, performance monitoring, reporting

Products	Compensation Description	Neutral Factors
Mutual Funds: IRAs	<p><u>Transaction Commission:</u> Less than \$250,000 2.50%, \$250,000 to less than \$500,000 2.00%, \$500,000 to less than \$1 million 1.50%, \$1 million or more 1.00%;</p> <p><u>Annual 12b-1 Fee:</u> 0.25%</p> <p><u>Revenue Sharing:</u> Mutual fund families pay Oppenheimer (0.03% based on average monthly assets and 0.10% based on monthly sales amounts)</p> <p><u>Networking and Shareholder Service Fees:</u> Mutual fund families pay Oppenheimer \$0-\$12 per investor per fund</p> <p><u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy</p>	<p><u>Pre-transaction:</u> client profile, fund research, suitability determination</p> <p><u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review, performance monitoring, reporting</p>



Products	Compensation Description	Neutral Factors
Mutual Funds: Qualified Retirement Plans	<p><u>Annual 12b-1 Fee:</u> 0.50%</p> <p><u>Revenue Sharing:</u> Mutual fund families pay Oppenheimer (insert \$ or bps amount)</p> <p><u>Networking and Shareholder Service Fees:</u> Mutual fund families pay Oppenheimer (\$0-\$12 per investor per fund)</p> <p><u>Marketing and Education Support:</u> expenses for attendance at due diligence and education meetings, client seminars, and non-monetary gifts in compliance with Oppenheimer's Non-cash Compensation Policy</p>	<p><u>Pre-transaction:</u> client profile, fund research, suitability determination</p> <p><u>Transaction:</u> order entry, processing and confirmation <u>Ongoing:</u> semi-annual account and investment review, performance monitoring, reporting</p>