

Copeland Variable Annuity

408(b)(2) Fee Disclosure Statement



The Department of Labor requires disclosure of fees, compensation and services provided to the plan to the responsible plan fiduciary. The following is important disclosure information that you should consider in connection with the non-fiduciary services to be provided by Nationwide Life Insurance Company, Nationwide Life and Annuity Insurance Company and their affiliates (“Nationwide”).

Should you have any questions about the information provided to you concerning our services or compensation or have any other inquiries or requests for additional information, please contact Nationwide’s Service Center at 1-800-848-6331. Information about Nationwide is included in the annuity contract prospectus.

General Information

Nationwide is a life insurance company and provider of life insurance policies and annuity contracts. It is admitted to do business in all states, the District of Columbia and Puerto Rico. Nationwide offers a wide array of such products, many with different charges, benefit features and underlying investment options. This process of comparison and analysis should aid in determining whether the purchase of the contract described in this disclosure is consistent with your investment objectives, risk tolerance, investment time horizon, marital status, tax situation and other personal characteristics and needs. Nationwide assumes no plan fiduciary responsibility.

Fees and Expenses

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| Mortality and Expense Risk charge | Nationwide deducts a Mortality and Expense Risk charge from the Variable Account. The charge is computed on a daily basis and is equal to an annualized rate of the Daily Net Assets of the Variable Account. Nationwide may realize a profit from this charge. |
| Administrative charge | Nationwide deducts an Administrative charge from the Variable Account. The charge is computed on a daily basis and is equal to an annualized rate of the Daily Net Assets of the Variable Account. Nationwide may realize a profit from this charge. |
| Maintenance charge | On each Contract Anniversary (and upon full surrender of the contract), Nationwide deducts a Contract Maintenance Charge. If, on any Contract Anniversary (or on the date of a full surrender), the Contract Value is \$50,000 or more, Nationwide will waive this charge from that point forward. |
| Premium taxes | Nationwide will charge against the Contract Value any premium taxes levied by a state or other governmental entity. These charges will be assessed at the time Nationwide is assessed the premium taxes by the state. Requirements may vary from state to state and are subject to change. |
| Contingent deferred sales charge (CDSC) | Nationwide does not deduct a sales charge from purchase payments upon deposit into the Contract. However, Nationwide may deduct a CDSC if any amount is withdrawn from the Contract. This CDSC reimburses Nationwide for sales expenses. For purposes of calculating the CDSC, surrenders are considered to come first from the oldest purchase payment, then the next oldest etc. Earnings are not subject to CDSC but may not be distributed prior to the distribution of all purchase payments. Note for tax purposes, a surrender is treated as a withdrawal of earnings first. |
| Loans | If loans are available to your plan and in your state, Nationwide may charge a loan processing fee of \$25 each time a new loan is processed. This fee compensates Nationwide for expenses related to administering and processing loans. Loan interest charges are 2.25% (net). |
| Commission | Nationwide pays a premium-based commission, asset-based commission or a combination of these to Firms that sell its annuity contracts. The maximum gross commission paid on this contract is 5.25% of purchase payments. |
| Marketing Allowance | Nationwide may pay the selling firm a marketing allowance which is based on the firm's willingness to promote Nationwide's products. For more information on the exact compensation arrangement associated with this contract, please consult the advisor. |
| Penalty-free withdrawal | Generally, Nationwide allows a percentage of purchase payments or the amount of the required minimum distribution, noncumulative to be taken without penalty. Note that withdrawals of earnings at any age are subject to ordinary income tax; distributions prior to age 59 ½ may be subject to a 10% tax penalty. |

Underlying Investment Options and Fees

The annuity contract prospectus contains more information about Nationwide's relationship with investment options and resulting benefits and payments.

Underlying investment options ("investment options") impose fees and expenses. These charges are in addition to the costs assessed by the contract. The prospectus for each investment option provides additional information regarding the applicable fees and expenses. Descriptions of applicable investment options, their expenses and how they are assessed including the minimum and maximum total operating expenses charged by the investment option are included in the annuity contract prospectus. For individual investment option prospectuses, refer to <https://www.nationwide.com/prospectuses.jsp>.

The investment options incur expenses each time they sell, administer, or redeem their shares. The Variable Account aggregates Contract Owner purchase, redemption, and transfer requests and submits net or aggregated purchase/redemption requests to each investment option daily. The Variable Account (not the Contract Owners) is the investment option shareholder. When the Variable Account aggregates transactions, the investment option does not incur the expense of processing individual transactions it would normally incur if it sold its shares directly to the public. Nationwide incurs these expenses instead. Nationwide also incurs the distribution costs of selling the contract, which benefit the underlying investment option by providing Contract Owners with Sub-Account options that correspond to the option.

An investment advisor or subadvisor of an investment option or its affiliates may:

- Provide Nationwide with wholesaling services that assist in the distribution of the contract and may pay Nationwide to participate in educational and/or marketing activities
- Pay Nationwide 12b-1 fees, sub-transfer agent fees, administrative service plan fees or payments by an investment option's advisor or subadvisor
- Make certain payments to Nationwide or its affiliates; the amount of these payments is typically based on a percentage of assets invested in the investment option attributable to the contracts and other variable contracts Nationwide and its affiliated issue, but in some cases may involve a flat fee. These payments may be used by Nationwide for any corporate purpose, which include reducing the prices of the contracts, paying expenses that Nationwide or its affiliates incur in promoting, marketing and administering the contracts and the investment options, and achieving profit

Product Basics

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| Cost | 1.30% (1.25% mortality and expense charge; 0.05% administrative charge) |
| Maintenance charge | \$0 - \$30 annually |
| Contingent deferred sales charge (CDSC) | 7-6-5-4-3-2-1-0% In CA, CDSC is called a surrender charge. For contracts issued before 12/15/88, the CDSC will not exceed the lesser of (1) 5% of the amount surrendered or (2) 5% of the total of all purchase payments made within eight years of the surrender date |
| Premium tax | 0.0 – 5.0% of purchase payments (based on state or government entity and subject to change) |
| Underlying Investment Options <i>The election of certain riders may limit the investment options available.</i> | <ul style="list-style-type: none"> • Over 190 variable subaccounts • One-year fixed account (not available in all states) • Short-term trading fee – 1.0% (assessed only when transferring to specific options) • Although both gross and net expenses are shown, only the net expense is used in the calculation of returns. The net expense is the percentage of investment option assets, net of reimbursements from the fund company, used to pay for operating expenses and management fees incurred by the fund. Investment option expenses are reflected in the daily unit value for the subaccount. These expenses are subject to change. <ul style="list-style-type: none"> ▪ Gross Expense Range/Average: 0.26% - 4.91%/0.99% ▪ Net Expense Range/Average: 0.24% - 1.67%/0.90% <p><i>The underlying funds are available only as underlying investment options in variable annuity and variable life insurance products issued by life insurance companies. They are not offered or made available to the general public. These portfolios contain different investments than similarly named mutual funds offered by the money manager. Investment results may result in higher or lower returns.</i></p> |

| Investment Option | Fund Status |
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| Asset Allocation | |
| AB VPS Dynamic Asset Allocation Portfolio - Class B | Substituted |
| American Funds Insurance Series(R) Capital Income Builder(R) - Class 4 | Active |
| American Funds Insurance Series(R) Global Balanced Fund - Class 4 | Active |
| BlackRock 60/40 Target Allocation ETF VI - Class III | Active |
| BlackRock Global Allocation VI Fund - Class III | Active |
| Calvert VP SRI Balanced Portfolio - Class F | Active |
| Fidelity(R) VIP Asset Manager Portfolio - Initial Class | Walled Off |
| Fidelity(R) VIP Balanced Portfolio - Service Class 2 | Active |
| Fidelity(R) VIP Freedom Fund 2010 Portfolio(SM) - Service Class | Walled Off |
| Fidelity(R) VIP Freedom Fund 2020 Portfolio(SM) - Service Class | Walled Off |
| Fidelity(R) VIP Freedom Fund 2030 Portfolio(SM) - Service Class | Walled Off |
| Franklin VIPT Allocation VIP Fund - Class 2 | Walled Off |
| Franklin VIPT Income VIP Fund - Class 2 | Walled Off |
| Goldman Sachs VIT Trend Driven Allocation Fund - Service Shares | Walled Off |
| Invesco V.I. Equity and Income Fund - Series I Shares | Walled Off |
| Janus Henderson VIT Balanced Portfolio - Service Shares | Active |
| LVIP American Century Balanced Fund - Standard Class II | Walled Off |
| Macquarie VIP Asset Strategy Series - Service Class | Walled Off |
| NVIT American Funds Asset Allocation Fund - Class II | Active |
| NVIT BlackRock Managed Global Allocation Fund - Class II | Active |
| NVIT Blueprint(SM) Aggressive Fund - Class II | Active |
| NVIT Blueprint(SM) Balanced Fund - Class II | Active |
| NVIT Blueprint(SM) Capital Appreciation Fund - Class II | Active |
| NVIT Blueprint(SM) Conservative Fund - Class II | Active |
| NVIT Blueprint(SM) Managed Growth & Income Fund - Class II | Active |
| NVIT Blueprint(SM) Managed Growth Fund - Class II | Active |
| NVIT Blueprint(SM) Moderate Fund - Class II | Active |
| NVIT Blueprint(SM) Moderately Aggressive Fund - Class II | Active |
| NVIT Blueprint(SM) Moderately Conservative Fund - Class II | Active |
| NVIT Investor Destinations Aggressive Fund - Class II | Active |
| NVIT Investor Destinations Balanced Fund - Class II | Active |
| NVIT Investor Destinations Capital Appreciation Fund - Class II | Active |
| NVIT Investor Destinations Conservative Fund - Class II | Active |
| NVIT Investor Destinations Managed Growth & Income Fund - Class II | Active |
| NVIT Investor Destinations Managed Growth Fund - Class II | Active |
| NVIT Investor Destinations Moderate Fund - Class II | Active |
| NVIT Investor Destinations Moderately Aggressive Fund - Class II | Active |
| NVIT Investor Destinations Moderately Conservative Fund - Class II | Active |
| NVIT Managed American Funds Asset Allocation Fund - Class II | Active |
| PIMCO VIT All Asset Portfolio - Advisor Class | Active |
| Putnam VT George Putnam Balanced Fund - Class IB | Active |
| Bonds | |
| American Funds Insurance Series(R) American High-Income Trust - Class 1 | Closed |
| American Funds Insurance Series(R) American High-Income Trust - Class 4 | Active |
| American Funds Insurance Series(R) U.S. Government Securities Fund - Class 1 | Walled Off |
| American Funds Insurance Series(R) U.S. Government Securities Fund - Class 2 | Active |
| BlackRock High Yield VI Fund - Class III | Active |
| BlackRock Total Return VI Fund - Class III | Active |
| Columbia VP High Yield Bond Fund - Class 2 | Active |

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| Eaton Vance VT Floating-Rate Income Fund - Initial Class | Walled Off |
| Fidelity(R) VIP Floating Rate High Income Portfolio - Initial Class | Active |
| Fidelity(R) VIP High Income Portfolio - Initial Class | Walled Off |
| Fidelity(R) VIP Investment Grade Bond Portfolio - Service Class | Active |
| Invesco V.I. Core Plus Bond Fund - Series I Shares | Walled Off |
| Invesco V.I. Global Strategic Income Fund - Series I | Active |
| Janus Henderson VIT Flexible Bond Portfolio - Service Shares | Active |
| Lord Abbett Series Total Return Portfolio - Class VC | Active |
| LVIP American Century Inflation Protection Fund - Service Class | Walled Off |
| Macquarie VIP High Income Series - Service Class | Walled Off |
| Morgan Stanley VIF Emerging Markets Debt Portfolio - Class I | Closed |
| NVIT American Funds Bond Fund - Class II | Active |
| NVIT Amundi Multi Sector Bond Fund - Class I | Active |
| NVIT BNY Mellon Core Plus Bond Fund - Class II | Substituted |
| NVIT BNY Mellon Core Plus Bond Fund - Class P | Active |
| NVIT Core Bond Fund - Class I | Walled Off |
| NVIT DoubleLine Total Return Tactical Fund - Class II | Active |
| NVIT Federated High Income Bond Fund - Class I | Active |
| NVIT Government Bond Fund - Class I | Walled Off |
| NVIT iShares Fixed Income ETF Fund - Class II | Active |
| PIMCO VIT Emerging Markets Bond Portfolio - Advisor Class | Active |
| PIMCO VIT Income Portfolio - Advisor Class | Active |
| PIMCO VIT International Bond Portfolio (U.S. Dollar-Hedged) - Advisor Class | Active |
| PIMCO VIT International Bond Portfolio (Unhedged) - Advisor Class | Walled Off |
| PIMCO VIT Real Return Portfolio - Advisor Class | Active |
| PIMCO VIT Total Return Portfolio - Advisor Class | Substituted |
| Templeton VIPT Global Bond VIP Fund - Class 2 | Walled Off |
| VanEck VIP Emerging Markets Bond Fund - Initial Class | Walled Off |
| Cash | |
| NVIT Government Money Market Fund - Class I | Active |
| International Stocks | |
| AB VPS International Value Portfolio - Class B | Walled Off |
| American Century VP International Fund - Class I | Substituted |
| American Century VP International Fund - Class III | Substituted |
| American Funds Insurance Series(R) Global Small Cap Fund - Class 4 | Active |
| American Funds Insurance Series(R) New World Fund - Class 4 | Active |
| Fidelity(R) VIP Emerging Markets Portfolio - Service Class 2 | Active |
| Fidelity(R) VIP Overseas Portfolio - Initial Class | Active |
| Invesco Oppenheimer V.I. International Growth Fund - Series II | Walled Off |
| Invesco V.I. Global Fund - Series I | Walled Off |
| Janus Henderson Global Sustainable Equity Portfolio - Institutional Shares | Active |
| Janus Henderson VIT Global Research Portfolio - Service Shares | Active |
| Janus Henderson VIT Overseas Portfolio - Service Shares | Active |
| Lazard Retirement Emerging Markets Equity Portfolio - Service Shares | Walled Off |
| MFS(R) VIT II International Growth Portfolio - Service Class | Active |
| MFS(R) VIT II International Intrinsic Value Portfolio - Service Class | Active |
| MFS(R) VIT II Research International Portfolio - Service Class | Active |
| Neuberger Berman AMT International Equity Portfolio - Class S | Substituted |
| NVIT American Funds Global Growth Fund - Class II | Active |
| NVIT Columbia Overseas Value Fund - Class I | Closed |
| NVIT Columbia Overseas Value Fund - Class X | Active |

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| NVIT Emerging Markets Fund - Class I | Walled Off |
| NVIT International Equity Fund - Class I | Closed |
| NVIT International Equity Fund - Class II | Active |
| NVIT International Index Fund - Class VIII | Active |
| NVIT iShares Global Equity ETF Fund - Class II | Active |
| NVIT NS Partners International Focused Growth Fund: Class I | Active |
| Putnam VT International Equity Fund - Class IB | Active |
| Putnam VT International Value Fund - Class IB | Active |
| Templeton VIPT Developing Markets VIP Fund - Class 2 | Walled Off |
| Templeton VIPT Foreign VIP Fund - Class 2 | Walled Off |
| VanEck VIP Emerging Markets Fund - Initial Class | Walled Off |
| Large Cap Stocks | |
| AB VPS Large Cap Growth Portfolio - Class B | Active |
| AB VPS Relative Value Portfolio - Class A | Active |
| Allspring VT Opportunity Fund - Class 2 | Substituted |
| American Century VP Ultra(R) Fund - Class I | Substituted |
| American Century VP Value Fund - Class I | Substituted |
| American Funds Insurance Series(R) Growth Fund - Class 1 | Walled Off |
| American Funds Insurance Series(R) Washington Mutual Investors Fund - Class 4 | Active |
| BlackRock Equity Dividend VI Fund - Class III | Walled Off |
| BNY Mellon Stock Index Fund, Inc. - Initial Shares | Walled Off |
| BNY Mellon Sustainable U.S. Equity Portfolio, Inc. - Initial Shares | Walled Off |
| BNY Mellon VIF Appreciation Portfolio - Initial Shares | Substituted |
| BNY Mellon VIF Growth & Income Portfolio - Initial Shares | Walled Off |
| CVT Nasdaq 100 Index Portfolio - Class F | Active |
| Fidelity(R) VIP Contrafund(SM) Portfolio - Initial Class | Substituted |
| Fidelity(R) VIP Contrafund(SM) Portfolio - Service Class 2 | Active |
| Fidelity(R) VIP Equity-Income Portfolio(SM) - Initial Class | Active |
| Fidelity(R) VIP Growth & Income Portfolio - Service Class 2 | Active |
| Fidelity(R) VIP Growth Opportunities Portfolio - Initial Class | Substituted |
| Fidelity(R) VIP Growth Portfolio - Initial Class | Active |
| Invesco V.I. Capital Appreciation Fund - Series I | Substituted |
| Invesco V.I. Main Street Fund - Series I | Substituted |
| Invesco VI American Franchise Fund - Series II Shares | Substituted |
| Janus Aspen Series INTECH Risk-Managed Core Portfolio - Service Shares | Substituted |
| Janus Henderson VIT Forty Portfolio - Service Shares | Walled Off |
| LVIP American Century Disciplined Core Value Fund - Standard Class II | Walled Off |
| LVIP American Century Value Fund - Service Class | Walled Off |
| MFS(R) VIT Value Series - Service Class | Active |
| Morgan Stanley VIF Growth Portfolio - Class II | Active |
| Neuberger Berman AMT Large Cap Value Portfolio - I Class | Substituted |
| Neuberger Berman AMT Sustainable Equity Portfolio - Class I | Walled Off |
| NVIT American Funds Growth Fund - Class II | Active |
| NVIT American Funds Growth-Income Fund - Class II | Active |
| NVIT AQR Large Cap Defensive Style Fund - Class I | Active |
| NVIT BlackRock Equity Dividend Fund - Class II | Active |
| NVIT BNY Mellon Dynamic U.S. Core Fund - Class I | Active |
| NVIT BNY Mellon Dynamic U.S. Equity Income - Class I | Closed |
| NVIT BNY Mellon Dynamic U.S. Equity Income - Class X | Active |
| NVIT BNY Mellon Dynamic U.S. Equity Income - Class Z | Closed |

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| NVIT Calvert Equity Fund - Class I | Active |
| NVIT Jacobs Levy Large Cap Core Fund - Class I | Walled Off |
| NVIT Jacobs Levy Large Cap Core Fund - Class II | Walled Off |
| NVIT Jacobs Levy Large Cap Growth Fund - Class I | Active |
| NVIT Managed American Funds Growth-Income Fund - Class II | Active |
| NVIT S&P 500 Index Fund - Class II | Active |
| Pioneer Fund VCT Portfolio - Class II | Active |
| Putnam VT Large Cap Value Fund - Class IB | Active |
| Putnam VT Sustainable Leaders Fund - Class IB | Active |
| T. Rowe Price Blue Chip Growth Portfolio - Class II | Substituted |
| T. Rowe Price Equity Income Portfolio - Class II | Substituted |
| Mid Cap Stocks | |
| Allspring VT Discovery SMID Cap Growth Fund - Class 2 | Substituted |
| American Century VP Capital Appreciation Fund - Class I | Substituted |
| BNY Mellon IP MidCap Stock Portfolio - Service Shares | Walled Off |
| Fidelity(R) VIP Mid Cap Portfolio - Service Class | Walled Off |
| Fidelity(R) VIP Value Strategies Portfolio - Service Class | Walled Off |
| Fidelity(R) VIP Value Strategies Portfolio - Service Class 2 | Active |
| Invesco V.I. Discovery Mid Cap Growth Fund - Series I | Active |
| Invesco V.I. Discovery Mid Cap Growth Fund - Series II | Walled Off |
| Invesco V.I. Main Street Mid Cap Fund - Series II Shares | Walled Off |
| Invesco V.I. Value Opportunities Fund - Series II Shares | Substituted |
| Janus Henderson VIT Enterprise Portfolio - Service Shares | Active |
| LVIP American Century Mid Cap Value Fund - Standard Class II | Walled Off |
| LVIP JPMorgan Mid Cap Value Fund - Standard Class | Walled Off |
| Macquarie VIP Mid Cap Growth Series - Service Class | Active |
| MFS(R) VIT III Mid Cap Value Portfolio - Service Class | Active |
| Neuberger Berman AMT Mid Cap Intrinsic Value Portfolio - Class S | Substituted |
| Neuberger Berman AMT Mid-Cap Growth Portfolio - Class S | Walled Off |
| NVIT Allspring Discovery Fund - Class I | Walled Off |
| NVIT Mid Cap Index Fund - Class I | Active |
| NVIT Victory Mid Cap Value Fund - Class II | Active |
| T. Rowe Price Mid-Cap Growth Portfolio - Class II | Active |
| Short-term Bonds | |
| Federated Hermes Quality Bond Fund II - Primary Shares | Walled Off |
| MFS(R) VIT III Limited Maturity Portfolio - Service Class | Active |
| Neuberger Berman AMT Short Duration Bond Portfolio - Class I | Walled Off |
| NVIT Loomis Short Term Bond Fund - Class II | Active |
| PIMCO VIT Low Duration Portfolio - Advisor Class | Walled Off |
| PIMCO VIT Short-Term Portfolio - Advisor Class | Active |
| T. Rowe Price Limited Term Bond Portfolio - Class II | Substituted |
| Small Cap Stocks | |
| AB VPS Discovery Value Portfolio - Class B | Active |
| Allspring VT Small Cap Growth Fund - Class 2 | Walled Off |
| BNY Mellon IP Small Cap Stock Index Portfolio - Service Shares | Walled Off |
| Franklin VIPT Small Cap Value VIP Fund - Class 2 | Walled Off |
| Invesco V.I. Main Street Small Cap Fund - Series I | Walled Off |
| Legg Mason Partners ClearBridge Variable Small Cap Growth Portfolio - Class II | Active |
| Macquarie VIP Small Cap Value Series - Service Class | Active |
| MFS(R) VIT New Discovery Series - Service Class | Active |
| NVIT Invesco Small Cap Growth Fund - Class I | Active |

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| NVIT Multi-Manager Small Cap Value Fund - Class I | Active |
| NVIT Multi-Manager Small Company Fund - Class I | Active |
| NVIT Small Cap Index Fund - Class II | Active |
| Specialty | |
| Columbia VP Seligman Global Technology - Class 2 | Active |
| Fidelity(R) VIP Energy Portfolio - Service Class 2 | Active |
| Fidelity(R) VIP Real Estate Portfolio - Service Class 2 | Walled Off |
| Goldman Sachs VIT Multi-Strategy Alternatives Portfolio - Service Shares | Active |
| Janus Henderson VIT Global Technology and Innovation Portfolio - Service Shares | Active |
| Morgan Stanley VIF Global Infrastructure Portfolio - Class II | Active |
| Morgan Stanley VIF U.S. Real Estate Portfolio - Class I | Substituted |
| NVIT Real Estate Fund - Class I | Active |
| Rydex VT Multi-Hedge Strategies Fund | Walled Off |
| T. Rowe Price Health Sciences Portfolio - Class II | Active |
| VanEck VIP Global Resources Fund - Class S | Active |
| VanEck VIP Global Resources Fund - Initial Class | Closed |
| Virtus VIT Duff & Phelps Real Estate Securities Series - Class A | Active |

Important Information

This material is not a recommendation to buy or sell a financial product or to adopt an investment strategy. Investors should work with their financial professional to discuss their specific situation.

Products include features that may be changed at the discretion of the insurer. Clients will be notified prior to any of these changes that affect the contract or policy.

All individuals selling this product must be licensed insurance agents and registered representatives.

Neither Nationwide, nor its affiliates, unless affirmatively communicated in writing to the contrary, are undertaking to provide impartial advice or to give advice in a fiduciary capacity.

An annuity does have limitations. Surrender charges may apply for early withdrawals. An additionally 10% tax penalty (on top of ordinary income taxes) may apply for withdrawals prior to age 59 ½. A death benefit is available with most variable annuities and if an early withdrawal is taken, the death benefit and the cash value of the annuity contract will be reduced. An annuity contains guarantees and protections that are subject to the issuing insurance company's ability to pay for them. But these guarantees don't apply to any variable accounts that are subject to investment risk, including possible loss of principal.

Variable products are sold by prospectus. Both the current product prospectus and underlying fund prospectuses can be obtained from the investment professional, by calling Nationwide Life Insurance Company at 1-800-848-6331, or at our website www.nationwide.com. Before investing, carefully consider the fund's investment objectives, risks, charges and expense. The product prospectus and underlying fund prospectuses contain this and other important information. Read the prospectuses carefully before investing.

Variable annuities are issued by Nationwide Life Insurance Company, Columbus, Ohio. The general distributor is Nationwide Investment Services Corporation, member FINRA, Columbus, Ohio.

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