



# *Ameriprise*<sup>®</sup> Retirement Plan Consulting Services

Client Disclosure Brochure  
(Form ADV Part 2A)  
March 2024

Ameriprise Financial Services, LLC  
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Minneapolis, MN 55474  
[ameriprise.com](http://ameriprise.com)

This Brochure provides information about the qualifications and business practices of Ameriprise Financial Services, LLC and the Ameriprise Retirement Plan Consulting Service. If you have any questions about the contents of this Brochure, please consult with your financial advisor or contact us at 800.862.7919 between 7 a.m. and 6 p.m. Central time. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Ameriprise Financial Services, LLC also is available on the SEC's website at [adviserinfo.sec.gov](http://adviserinfo.sec.gov)

# Material Changes

This Brochure dated March 2024 is filed as the annual update to Form ADV Part 2A. No material changes have occurred since the Brochure was first filed in November 2023.

Ameriprise Financial Services will notify you when there are material changes to this Brochure and offer you the opportunity to request a copy of the revised Brochure. You should carefully review any material changes and consider requesting a revised Brochure as that revised Brochure will replace any previous version you have received.

You may request copies of the Brochure by writing to Ameriprise Financial Services, LLC at 2661 Ameriprise Financial Center, Minneapolis, MN 55474, or by calling 800.862.7919.

**Please retain a copy of this Brochure for your records.**

# Table of Contents

<b>Advisory Business</b> .....	<b>1-3</b>	<b>How we get paid</b> .....	<b>12-17</b>
<b>Fees and Compensation</b> .....	<b>3</b>	<b>Code of Ethics, Participation or Interest in Transactions and Personal Trading</b> .....	<b>17-18</b>
<b>Performance-Based Fees and Side-by-Side Management</b> .....	<b>3</b>	<b>Brokerage Practices</b> .....	<b>18</b>
<b>Types of Clients</b> .....	<b>4</b>	<b>Review of Accounts</b> .....	<b>18</b>
<b>Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>4-6</b>	<b>Client Referrals and Other Compensation</b> .....	<b>18-21</b>
<b>Disciplinary Information</b> .....	<b>6-9</b>	<b>Custody</b> .....	<b>21</b>
<b>Other Financial Industry Activities and Affiliations</b> .....	<b>9-12</b>	<b>Investment Discretion</b> .....	<b>21</b>
		<b>Voting Client Securities</b> .....	<b>21</b>
		<b>Financial Information</b> .....	<b>21</b>
		<b>Glossary</b> .....	<b>22-23</b>

# Advisory Business

Ameriprise Financial Services, LLC (“Ameriprise Financial Services”) is an investment advisory firm offering financial planning services since 1986. Ameriprise Financial, Inc., a publicly held company, is the parent company of Ameriprise Financial Services.

References in this Brochure to “you” and “your” apply to each client who signs the Retirement Plan Consulting Services Agreement (“Agreement”). References to “us,” “we,” and “our” refer to Ameriprise Financial Services, LLC. References to “your financial advisor” are to your Ameriprise financial advisor.

## Ameriprise<sup>®</sup> Retirement Plan Consulting Services

Ameriprise<sup>®</sup> Retirement Plan Consulting Services (“RPCS”) is designed to assist employers and trustees in their role as a plan fiduciary (“Plan Fiduciary”). The specific scope of services provided to each Plan Fiduciary are agreed upon by you and your financial advisor on a case- by-case basis and an engagement would typically include one or more of the following services, which may be offered in whole or in part, as negotiated with a Plan Fiduciary:

- Investment committee support
- Plan lineup construction
- Investment performance monitoring
- Attendance at Plan Fiduciary meetings and additional plan support
- Participant education and client maintenance services

Ameriprise Financial Services and your financial advisor provide non-discretionary “investment advice” services as a fiduciary to your plan under Section 3(21) of ERISA with respect to investment monitoring and recommendations provided to the plan. Your financial advisor is not permitted to serve as a trustee for your plan or as a member of your investment committee. Neither Ameriprise Financial Services nor your financial advisor will have discretionary investment or trading authority with respect to your plan and we are therefore not an investment manager under Section 3(38) of ERISA. Participant education and client maintenance services are educational and general in nature and do not constitute “investment advice” under ERISA and therefore neither Ameriprise Financial Services nor your financial advisor will be a fiduciary to the plan or the participant with respect to those services.

**Investment Committee Support:** The financial advisor assists a Plan Fiduciary sometimes directly and sometimes through its investment committee in developing and maintaining an investment policy statement. The financial advisor will assist in providing information to aid the Plan Fiduciary in creating policy statements or the revision thereof including risk levels, allocations, relative index selection, asset class ranges, plan investment objectives, or other criteria that may be pertinent. The financial advisor also may provide services for facilitating and documenting investment committee meetings and communicating industry trends to the Plan Fiduciary. Information regarding these services may be proprietary to Ameriprise or from an outside source. It is the responsibility of the Plan Fiduciary to verify this data.

**Plan Lineup Construction:** The financial advisor will use the plan’s investment objectives to recommend specific investment products to be held by the plan, or in the case of a participant-directed defined contribution plan to be made available as investment options under the plan. Your financial advisor conducts due diligence on current and potential investment managers and providing reports and advice to the Plan Fiduciary. Your financial advisor may also assist Plan Fiduciaries in establishing and monitoring a watch list for investment products and/or investment managers.

For Defined Benefit plans, your financial advisor will typically also recommend a target asset allocation for the plan based on a variety of factors including, but not limited to, risk tolerance, investment objective, historical performance of different asset classes, and plan funding ratios. Asset mixes are derived using available historical information and projected performance for each asset class based on the selected performance index for that class. They are meant only to illustrate the relative experience between asset classes and portfolios. Other asset classes and indices may have characteristics similar or superior to those being analyzed. Generally periodic rebalancing of the portfolio and reallocation among the asset classes is recommended. It is the Plan Fiduciary’s responsibility to ultimately select and implement an asset allocation mix based on plan suitability.

**Investment Performance Monitoring:** The financial advisor monitors plan investments on a periodic basis and prepares reports on investment or portfolio performance to the Plan Fiduciary. The strategy for meeting investment objectives for each investment

product or portfolio is left to the independent investment managers hired by the Plan Fiduciary, although Ameriprise Financial Services may identify and report on drift away from an investment's stated investment objectives to the Plan Fiduciary. The financial advisor may also prepare reports for clients, which may include an assessment of performance over various time periods.

**Plan Fiduciary Meetings and Additional Plan Support:** The financial advisor may attend periodic meetings with Plan Fiduciaries. At these meetings, the financial advisor may share industry knowledge, proprietary or non-proprietary research, economic outlooks, reports from the plan record keeper regarding plan health or other pertinent information. To the extent that these sources are developed by third parties, Ameriprise Financial Services will not verify data and will not be able to attest to the points of view expressed within. Your financial advisor's attendance of these meetings is negotiated on a case by case basis. The financial advisor may provide additional support and services to the plan such as acting as liaison between the plan and service providers, products sponsors and/or other vendors, assisting with the preparation, distribution and evaluation of requests for proposals, finalist interviews, conversion support and analysis and assistance in identifying the fees and other costs borne by the plan. **Participant Education and Client Maintenance Services:** The financial advisor provides services such as participant education, which may include preparation of education materials and/or conducting investment education seminars and meetings for Plan participants, assisting you with enrolling plan participants in the plan, and other consulting services as negotiated between you and your financial advisor. These services do not include any individualized investment advice to the Plan Fiduciary or plan participants with respect to plan assets, and we do not act as fiduciaries under ERISA in providing such consulting services.

**Ameriprise Financial Services and your financial advisor do not provide legal or tax advice.**

## Implementation of your recommendations

RPCS is a non-discretionary investment advisory service. This means RPCS does not include the implementation of any recommendations presented to you by your financial advisor. Before implementing any recommendations, carefully consider the ramifications of purchasing products or services. You may want to seek further advice from your lawyer and/or accountant, particularly for taxes, or business planning issues.

RPCS does not provide specific buy, sell or hold recommendations concerning individual securities to plan participants and your financial advisor cannot assist plan participants with implementing or initiating any transactions within the plan.

Investment advice provided to Plan Fiduciaries is limited to the plan you have designated to be included in the service. RPCS does not include ongoing monitoring of, or advice related to, any other investments, accounts, or income streams.

## Ongoing Service relationship

You may change the RPCS services provided to Plan Fiduciaries by discussing any desired changes with your financial advisor. In addition, after looking at the needs of your plan, your financial advisor may decide to recommend additional services that have not already been identified. You and your financial advisor should also discuss whether your RPCS Fee needs to change in light of the changes to the needs of your plan.

## Other advisory services

Your financial advisor may establish a client relationship with one or more plan participants. Such client relationships may occur: 1) through an IRA rollover distributed from this or any other plan; or 2) because of a decision by the participant to purchase other investment products or services from your financial advisor. Any client relationship established with a plan participant will be outside of the scope of your RPCS services. When a plan participant chooses to purchase products and services through Ameriprise Financial Services, the plan participant has the option of investing through a commission-based brokerage account, or a fee-based managed account, or both. The plan participant will work separately and directly with a financial advisor to implement recommendations within the managed accounts, Ameriprise brokerage accounts, or other products and services made available through Ameriprise Financial Service or our affiliates, as appropriate.

Ameriprise Financial Services offers a suite of Advisory Solutions that features several types of Programs, including Strategic Portfolio Service ("SPS") *Advantage*, SPS Advisor, *Active Portfolios*® investments, Select Separate Account, Vista Separate Account, Investor Unified Account, and Access Account. Not all Managed Account Programs are available to all clients; contact your financial advisor for more information. Please review the *Ameriprise* Managed Accounts Client Disclosure Brochure, or if you have elected to pay a consolidated advisory fee, the *Ameriprise* Managed Accounts and Financial Planning Service Disclosure Brochure for a full description of these Programs.

Your financial advisor may offer ongoing financial planning or other services that are described in the *Ameriprise Financial Planning Service Client Disclosure Brochure*.

As of December 31, 2023, Ameriprise Financial Services managed \$259,396,635,912 in nondiscretionary assets and \$266,195,278,158 in discretionary assets.

## Fees and Compensation

The fee you pay for investment advice and services for RPCS (the “RPCS Fee”) is based on one the following, as negotiated between you and your financial advisor:

- a percentage of the assets held in the plan (up to 1.25% annually); or
- on a flat rate basis which generally shall not exceed 1.25% of the plan however in certain circumstances may exceed this rate when the flat fee covers a unique or complex range of services, such as advice relating to the initial plan setup.

RPCS Fees vary based on a number of factors including (1) the range of services provided; (2) your financial advisor’s years of experience, professional credentials, and other factors, such as local market considerations; and (3) the overall complexity of your plan’s needs and services. RPCS Fees are negotiable and there is no assurance that similarly situated clients will be assessed comparable fees. Ask questions about the RPCS Fee so that you understand the factors considered in arriving at your RPCS Fee and what you can expect for this fee.

The RPCS Fee will be payable to Ameriprise Financial Services in advance or in arrears on the frequency (e.g., quarterly, monthly, etc.) agreed upon between you and your financial advisor. If the RPCS Fee is based on a percentage of the assets held in the plan the RPCS Fee payment generally will be based on the value of the plan assets as of the close of business on the last business day of the period as valued by the custodian of the assets. However, if the RPCS Fee is paid by the plan or by you through a third party service provider, such fee will be calculated as determined by the provider. If the RPCS Fee is paid prior to the services being provided, the plan will be entitled to a prorated refund of any prepaid fees for services not received upon termination of the Agreement.

The portion of the RPCS Fee allocated to your financial advisor is impacted by factors including the level of affiliation that the financial advisor has with Ameriprise Financial Services and whether the financial advisor was assisted by another person (which may be a financial advisor or other individual who makes a referral) in providing services to you. The remaining portion of the fee goes to Ameriprise Financial Services for the supervisory, technical, infrastructure, administrative and other support provided to financial advisors offering RPCS.

Ameriprise Financial Services is dedicated to providing quality client service. We work hard to ensure your satisfaction with the RPCS services that you receive and seek to meet or exceed your expectations. We will work with you to address any of your concerns, including helping you work with a different financial advisor or terminating the Agreement.

## Termination of RPCS

RPCS will remain in effect until one of the following occurs: termination by you; termination by Ameriprise Financial Services, which would require sending you written notice reasonably in advance of the termination date to your address as shown on our records; or termination by you through nonpayment of the RPCS Fee.

To terminate or cancel the Agreement and request a refund, if eligible, complete an RPCS Cancellation and Refund Request form available from [ameriprise.com](http://ameriprise.com). You may also request the form from your financial advisor or by contacting Ameriprise Financial Services directly at by emailing us at [RPCS.Program@ampf.com](mailto:RPCS.Program@ampf.com).

## Performance-Based Fees and Side-by-Side Management

Neither Ameriprise Financial Services nor any of its supervised persons accepts performance-based fees for its investment advisory services.

# Types of Clients

RPCS is available to clients that are trustees or other fiduciaries to plans, including 401(k), 457(b), 403(b) and 401(a) plans. Plans include participant directed defined contribution plans and defined benefit plans. Ameriprise Financial Services does not require a minimum asset amount or impose a minimum fee for RPCS. The investment advisory services provided by Ameriprise Financial Services and our financial advisors, as applicable, are services that are provided only to the Plan Fiduciary or the plan, and not to any particular plan participant.

# Methods of Analysis, Investment Strategies and Risk of Loss

## Methods of financial analysis

When developing recommendations, your financial advisor may use training and marketing materials and prospectuses and annual reports for a particular investment product. In addition, your financial advisor may also utilize research produced by Ameriprise Financial Services or its affiliates, such as material prepared by the Ameriprise Investment Research Group ("IRG").

Your financial advisor may use asset value, current and projected rates of return, and other assumptions, as well as historical return analysis. Your recommendations may be prepared through the use of one or more third-party software packages that use one or more methods of analysis, including deterministic and probability modeling. The analysis and projections generated by this software or other analysis tools typically include information regarding the likelihood of various potential investment outcomes. They are hypothetical in nature, vary depending on which tool of analysis is used and with each use and over time, do not reflect actual investment results, and are not guarantees of future results. Investing in securities involves the risk of loss and you should be prepared to bear this loss. The probability of success also varies based on differing assumptions, on different tools, changing circumstances and market information.

Your financial advisor may rely on information or data from third-party research providers that have been approved by Ameriprise Financial Services when providing investment advice, including performance analytics services, financial publications, interviews or questionnaire responses from investment managers, and other sources when providing RPCS. From time to time, Ameriprise Financial Services or your financial advisor may provide you with general market commentary and non-securities material prepared by third parties and approved for use by Ameriprise Financial Services. Among other things, this information may include performance information or market data relating to securities and securities markets. Although the information and data are believed to be accurate, Ameriprise Financial Services and its financial advisors do not independently verify third-party information. Neither Ameriprise Financial Services nor its financial advisors guarantee the accuracy, completeness or timeliness of any such information nor do they imply any warranty of any kind regarding the information provided.

For your plan accounts and assets all market value (i.e., account value) information used in connection with your RPCS was provided by you or your designated agents and is shown as of the date it was provided to Ameriprise Financial Services. Ameriprise Financial services does not have knowledge of changes in your plan assets. **This means that if you do not provide updated information about plan assets, the recommendations provided to you will be based on data about plan assets that is not current.** Ameriprise Financial and your financial advisor take reasonable steps to reproduce information obtained from you or your designated agents regarding plan assets.

**The information provided to you in your analysis and written recommendations is not intended to be a substitute for the valuation and other information contained in your plan's official statements provided by the plan custodian, recordkeeper or administrator, as applicable. Neither Ameriprise Financial nor your financial advisor has undertaken to review or verify the accuracy of plan assets.**

## Investment strategies

The investment advice and other information provided under RPCS is designed to align with the plan's investment policy statement or the plan's fiduciary guidelines and is intended to be consistent with generally accepted retirement plan investment strategies.

We cannot guarantee future financial results or the achievement of your plan's investment objectives through implementation of any advice or recommendations provided to you by your financial advisor. Ameriprise Financial Services does not monitor the day-to-day performance of your specific investments. Before implementing your recommendations, you should carefully consider the ramifications of purchasing products or services, and you may want to seek further advice from your lawyer and/or accountant, particularly in connection with estate planning and taxes.

## Investment and market risk

You should understand that:

- All investments involve the risk of loss and you should be prepared to bear such a loss (the amount of which may vary significantly),
- Investment performance or tax treatment of any accounts and assets included in your plan can never be predicted or guaranteed,
- The market value of your plan will fluctuate due to market conditions and other factors such as liquidity and volatility,
- There is no guarantee that the service or its related recommendations will meet its objectives,
- Past performance does not predict future performance with respect to any product or service described in this Disclosure Brochure,
- All trading in your accounts will be at your risk.
- The risks of participating in the Service include but are not limited to the following:
- **Market Risk.** Market risk refers to the possibility that the market values of securities or other investments will fall, sometimes rapidly or unpredictably, or fail to rise, because of a variety of actual or perceived factors affecting issuer, industry or sector in which it operates or the market as a whole.
- **Interest Rate Risk.** The interest rate risk is the risk that investment value is sensitive to changes in interest rates. In general, a rise in interest rates may result in a price decline of fixed-income instruments. This risk may be heightened for longer maturity and duration instruments.
- **Inflation Risk.** Inflation risk is the uncertainty over the future value of an investment due to inflation. Investments may not keep pace with inflation, which may result in losses.
- **Liquidity Risk.** Liquidity risk is the risk associated with any event, circumstance, or characteristic of an investment or market that negatively impacts the ability to sell, or realize the proceeds from the sale of, an investment at a desirable time or price.
- **Tax Risk.** This is the risk that the tax treatment of certain investments and of the income and gain therefrom is uncertain and can vary over time.
- **Legal and Regulatory Risk.** This is the risk that new or revised laws or regulations may adversely affect investments included in the Service.
- **Business Disruption Risk.** This is the risk of business disruption of varying severity and scope occurring. The types of disruption may include, but not be limited to, firm-only disruption, disruption that affects a single building, a disruption that affects the entire city or business district, and disruption that affects the entire region. Please read more in Ameriprise Financials' Business Continuity Plan Disclosure and Ameriprise Financial Client Relationship Guide.
- **Cybersecurity Risk.** With the use of technologies such as internet to conduct business, businesses are susceptible to cybersecurity breaches, please read more at <https://www.ameriprise.com/privacy-security-fraud>.
- **Technology Risk.** Businesses must rely in part on digital and network technologies to conduct business, provide services and maintain business operations. These technology systems may fail to operate properly or become disabled as a result of events or circumstances wholly or partly beyond control. Technology failures, whether deliberate or not, could have a material adverse effect and could result in, among other things, financial loss, reputational damage, regulatory penalties or the inability to conduct business.



The risks described above should not be considered to be an exhaustive list of all the risks which clients should consider.

## Disciplinary Information

Below is notice of certain regulatory and legal settlements entered into by Ameriprise Financial Services:

### Regulatory proceedings

Ameriprise Financial Services entered into each of the regulatory settlements listed below without admitting or denying the allegations.

### Securities and Exchange Commission (“SEC”) and FINRA (fka NASD) actions

In August 2018, Ameriprise Financial Services reached a settlement with the SEC regarding allegations that from 2011 through 2014 the firm failed to adopt and implement policies and procedures reasonably designed to safeguard retail investor assets against misappropriation and failed to reasonably supervise five representatives with a view to preventing and detecting violations of certain federal securities laws by these representatives. The firm agreed to pay a civil penalty amount of \$4.5 million. The firm further reimbursed all impacted clients for the losses they incurred due to the misconduct. The firm also took steps to enhance policies, procedures and controls related to the safeguarding of client assets against theft or misappropriation by its associated persons and voluntarily retained a compliance consultant to assess and confirm the reasonableness of these policies, procedures and controls.

In December 2017, Ameriprise Financial Services reached a settlement with the SEC regarding allegations that from December 2010 through October 2013, the firm negligently relied on misrepresentations made by F-Squared Investments, Inc. regarding certain of its ETF portfolios and, as a result, the firm made false statements about the portfolios in certain advertisements. The SEC also alleged that the firm had failed to adopt and implement written compliance policies and procedures reasonably designed to prevent the alleged violations. The firm agreed to pay a disgorgement amount of \$6.3 million plus prejudgment interest of \$700,000 and a civil penalty amount of \$1.75 million.

In September 2016, Ameriprise Financial Services reached a settlement with FINRA regarding allegations that between October 2011 and September 2013 the firm failed to detect and prevent the conversion, via wire transfers, of more than \$370,000 from five of its customers by one of its registered representatives. The customers were family members of the registered representative. FINRA also alleged this went undetected because the firm failed to establish, maintain, and enforce a supervisory system that was reasonably designed to review and monitor the transmittal of funds from accounts of customers to third parties, including those controlled by registered representatives of the firm. The firm paid restitution and a fine of \$850,000.

## Other financial industry activities and affiliations

Ameriprise Financial Services, LLC is a subsidiary of **Ameriprise Financial, Inc.** and conducts its activities directly and through its affiliates. These activities may be material to its investment advisory business or its investment advisory clients. These affiliates include companies under common control with Ameriprise Financial Services by virtue of their status as direct or indirect subsidiaries of Ameriprise Financial, Inc. The information below provides you an overview of the Ameriprise Financial, Inc. companies. These companies work together to offer you financial products and services designed to help you reach your financial goals.

### Broker-dealer

**Ameriprise Financial Services, LLC** is a registered investment adviser and broker-dealer with the SEC and is authorized to engage in the securities business in all 50 states as well as the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. Ameriprise Financial Services is also a member of FINRA and the Securities Investor Protection Corporation (“SIPC”). Ameriprise Financial Services is registered with the Commodity Futures Trading Commission (“CFTC”) as a commodity trading advisor (“CTA”) and has obtained membership with the National Futures Association (“NFA”) in connection with such CFTC registration.

In its capacity as a broker-dealer, Ameriprise Financial Services distributes or receives compensation from selling various

products including but not limited to equities and fixed income products. Offerings include corporate bonds and municipal securities, mutual fund shares, ETFs, 529 plans, face-amount certificates, closed-end funds, preferred securities, UITs, non-traded REITs, non-traded BDCs, non-traded closed end funds, hedge fund offerings, structured products, real estate private placement offerings, exchange funds, private equity offerings, 1031 exchanges, fixed, structured and variable annuities, and fixed and variable insurance. Ameriprise Financial Services also sells managed futures funds that engage in trading commodity interests, including futures.

In addition, Ameriprise Financial Services is the distributor of the publicly offered face-amount certificates issued by **Ameriprise Certificate Company**.

Ameriprise Financial Services also may serve as an underwriter or member of a selling group for securities offerings, including those issued by affiliates.

Retail brokerage services are made available through Ameriprise Financial Services, which has an agreement with **American Enterprise Investment Services Inc.** (“AEIS”), a registered broker-dealer and an affiliate of Ameriprise Financial Services. Ameriprise Financial Services requires clients to agree in their client agreements that their account(s) are introduced by Ameriprise Financial Services to AEIS on a fully-disclosed basis, and that securities purchase and sale transactions in their account(s) shall be directed through AEIS.

For purposes of Form ADV Part 2 certain Ameriprise Financial Services management persons are registered representatives of Ameriprise Financial Services in its capacity as a broker-dealer, registered representatives of American Enterprise Investment Services Inc., and are associated persons of Ameriprise Financial Services in its capacity as a commodity trading advisor.

Ameriprise Financial Services approves and opens accounts and accepts securities order instructions with respect to the accounts. AEIS serves as Ameriprise Financial Services’ clearing agent in providing clearing and settlement services for transactions that are executed for customers of Ameriprise Financial Services. In exchange for a fee paid by Ameriprise Financial Services, AEIS provides clearing, custody, record keeping and all clearing functions for certain advice-based accounts.

In addition, AEIS may act as an agent in effecting securities transactions for certain Ameriprise Bank trust accounts.

**AMPF Holding LLC**, an indirect wholly-owned subsidiary of Ameriprise Financial, Inc., is a holding company for Ameriprise Financial Services and AEIS.

**Columbia Management Investment Distributors, Inc.** (“Columbia Management Investment Distributors”), an indirect wholly-owned subsidiary of Ameriprise Financial, Inc., is a registered broker-dealer serving as principal underwriter and distributor of registered mutual funds and other funds advised by affiliated companies Columbia Management Investment Advisers, LLC (“CMIA”) and Columbia Wanger Asset Management, LLC, (“Columbia Wanger Asset Management”) (collectively, “Columbia Management” or “Columbia”). These funds are collectively referred to as the “Columbia Funds.”

## Investment company

Ameriprise Financial Services has arrangements with Ameriprise Certificate Company to distribute and sell its face-amount certificates and selling arrangements with Columbia Management Investment Distributors to distribute the Columbia Funds.

## Investment advisory firm

**Columbia Management Investment Advisers, LLC (CMIA)** is registered as an investment adviser with the SEC.

CMIA provides investment management services to:

- Columbia Funds, as well as Columbia ETFs, closed-end funds and private funds
- Ameriprise Certificate Company
- RiverSource, as well as the Columbia Funds underlying certain variable contracts issued by RiverSource
- Various wrap program sponsors, including Ameriprise Financial Services
- Other affiliated and unaffiliated clients.

Ameriprise Financial, Inc. has other subsidiaries that are registered as investment advisers with the SEC, including Threadneedle International Limited, Columbia Wanger Asset Management and Lionstone Partners, LLC. These subsidiaries are registered as investment advisers and may provide advice to domestic and foreign institutional clients, the Columbia

Funds, the Columbia ETFs, the Columbia closed-end funds, private funds and other fiduciary clients. These entities provide services independent from Ameriprise Financial Services. Columbia Management and its affiliates Threadneedle Asset Management Ltd, (U.K. based), Threadneedle Investments Singapore (Pte.) Limited (Singapore based), and Columbia Threadneedle Investments (ME) Limited (Dubai based) operate under a combined global asset management brand, Columbia Threadneedle Investments.

Ameriprise Financial Inc. also has non-US subsidiaries that provide asset management services. These include Columbia Threadneedle Management Limited (“CTML”), Columbia Threadneedle Netherlands B.V. (“CTLN”), Columbia Threadneedle Business Limited (“CTBL”), Columbia Threadneedle AM (Asia) Limited (“CTAMLA”), Columbia Threadneedle (EM) Investments Limited (“CT (EM)”) and Pymford International Ltd (“Pymford”). Each of CTML, CTLN, CTBL, CTAMLA, CT (EM) and Pymford is registered with the appropriate respective regulators in their home jurisdictions. In addition CT (EM) and Pymford are also registered with the SEC as investment advisers. Columbia Management Investment Advisers is also registered with the CFTC as a commodity pool operator and a CTA and has obtained membership with the NFA in connection with such CFTC registration. Threadneedle International Limited is registered with the CFTC as CTA and has obtained membership with the NFA in connection with such CFTC registration.

## Banking institution

**Ameriprise Bank, FSB**, a wholly owned subsidiary of Ameriprise Financial, Inc. and an affiliate of Ameriprise Financial Services, is a federal savings bank. In addition to its participation in the AIMMA and ABISA Sweep Programs, Ameriprise Bank currently makes available a core set of banking products, including mortgage financing, co-branded credit cards with an associated rewards program, savings and checking accounts, and pledged asset loans. Ameriprise Bank provides personal trust services to clients, including trustee and investment management services for asset trusts, and investment management and custodial agency services for individual, individual trustee, association and non-profit organization accounts.

Ameriprise Financial Services establishes custodial accounts and accepts securities order instructions for trust accounts at Ameriprise Bank. In addition, Ameriprise Financial Services may provide investment advice and research support to Ameriprise Bank and its clients for these trust accounts.

## Trust company

**Ameriprise Trust Company** (“ATC”), a Minnesota-chartered trust company, provides custodial, investment management and collective trust fund services for employer-sponsored retirement plans, including pension, profit sharing, 401(k) and other qualified and nonqualified employee retirement plans. ATC also serves as custodian for IRAs, 403(b)s and some retirement plans qualified under section 401(a) of the Internal Revenue Code of 1986 as well as the Ameriprise Certificate Company. ATC is not a deposit bank or a member of FDIC.

## Insurance company

Insurance products sold by Ameriprise Financial Services and its financial advisors are issued primarily by **RiverSource Life Insurance Company** (RiverSource Life), a stock life insurance company that is qualified to do business as an insurance company in the District of Columbia, American Samoa and all states except New York; and in New York only, issued by **RiverSource Life Insurance Co. of New York** (“RiverSource Life of NY”), a stock life insurance company that is qualified to do business as an insurance company in New York.

The products of RiverSource Life and RiverSource Life of NY (together “RiverSource”) include structured annuities (RiverSource Life only), fixed and variable annuities, fixed and variable life insurance, disability income insurance and life insurance with long-term care benefits. Insurance products are also offered by other third parties through an arrangement with Ameriprise Financial Services and through Diversified Brokerage Services, Inc. and Crump Insurance Services, Inc., which act as co-general agents.

**RiverSource Distributors, Inc.** (“RiverSource Distributors”), a wholly owned subsidiary of Ameriprise Financial, Inc., is a registered broker-dealer, serving as principal underwriter and distributor of RiverSource variable life insurance and annuities on behalf of RiverSource. Ameriprise Financial Services has selling arrangements with RiverSource and RiverSource Distributors to distribute these products.

## Ameriprise Financial Institutions Group (“AFIG”)

AFIG is a business channel within Ameriprise Financial Services that specializes in delivering investment products and services to clients of financial institutions, such as banks and credit unions. Ameriprise Financial Services enters into a networking arrangement with each financial institution whereby AFIG financial advisors provide one or more of our investment advisory services, brokerage services and insurance products to clients of the financial institution and other persons or entities that may be introduced or referred to us by the financial institution. The financial institution provides AFIG financial advisors joint marketing access to a distinct client segment and may provide office space in the building where it conducts its business. As a part of the contractual arrangement with the financial institution, Ameriprise Financial Services shares with the financial institution a portion of up to 94% of fees and commissions, including Wrap Fees charged for investment advisory services, generated by AFIG financial advisors that are attributable to our operations under the joint marketing agreement with the financial institution.

A portion of these fees may be paid to financial advisors who are employees of the financial institution, as described below.

All AFIG financial advisors are licensed and registered through Ameriprise Financial Services. Ameriprise Financial Services has exclusive control over the activities conducted on our behalf under the agreement with the financial institution and is responsible for the supervision of certain activities of AFIG financial advisors. AFIG financial advisors are affiliated with Ameriprise Financial Services in one of three ways: independent contractors and their personnel, Ameriprise employee financial advisors and financial institution employee financial advisors. Financial advisors employed by the financial institution are compensated by the financial institution from the portion of fees and commissions it receives from Ameriprise Financial Services. In such cases the financial institution serves as paying agent on our behalf in accordance with applicable law. The level of compensation received by financial advisors employed by the financial institution is based on their employment agreement with the financial institution.

Ameriprise Financial Services does not pay any compensation to any non-registered employee or agent of the financial institution for referrals. Any referral fee paid by the financial institution to an employee or agent is a one-time, per-customer fee of a nominal, fixed dollar amount and is unrelated to the products and services you purchase.

AFIG financial advisors who provide services at a financial institution that does not have a Trust Department can offer trust services through other providers, including our affiliate, Ameriprise Bank. Ameriprise Financial Services and the AFIG financial advisor may serve as a finder related to trust services and may receive a referral fee for business referred to unaffiliated trust providers.

**Ameriprise Financial Services is not a bank or credit union. Any services or products you purchase through an AFIG financial advisor are not guaranteed or insured by Ameriprise Financial Services or the financial institution. The financial institution is not a party to your Client Agreement with us. Ameriprise Financial Services and each financial institution have entered into a networking agreement under which we have agreed to share fees and commissions with the financial institution, including Wrap Fees charged for investment advisory services. Non-registered employees of the financial institution may also receive compensation for referring you to Ameriprise Financial Services.**

## How we get paid

For RPCS Ameriprise Financial Services collect the RPCS Fee and we do not collect additional revenue based on investments recommended to be held by a plan. For accounts held at Ameriprise Financial Services, we and our affiliates receive revenue from several different sources on the products and services available for purchase in our managed accounts, Ameriprise brokerage accounts, or other products and services made available through Ameriprise Financial Service or our affiliates. **These account types and services are not included as part of RPCS.**

More information about payments for cost reimbursement services and marketing support payments received by us and our other affiliates, including a description of conflict of interest, is available for Ameriprise brokerage accounts at <https://www.ameriprise.com/bestinterest> and for managed accounts at <https://www.ameriprise.com/disclosures> and clicking on the sub-heading “Managed Account Client Disclosure Brochures”.

## Revenue sources for Ameriprise Financial Services, LLC

**Financial planning and advisory service fees.** These are fees you pay for financial planning and fee-based investment advisory account services, respectively.

**Ameriprise brokerage account sales charges.** Sales charges, commissions and/or selling concessions are paid when you buy or sell equities or fixed income products including corporate bonds and municipal securities, mutual funds, 529 plans, closed-end funds, preferred securities, UITs, non-traded REITs, non-traded BDCs, non-traded closed-end funds, hedge fund offerings, exchange funds, private equity offerings, managed futures funds, real estate private placement offerings and structured products. In addition, you may pay a markup or markdown in bond transactions executed in a principal capacity with AEIS. These charges vary by product and product type. For example, with respect to mutual funds, the sales charge for a stock mutual fund is typically greater than that for a bond mutual fund. For other product types such as non-traded REITs, the sales charge you pay may also include a portion of the distribution, organization and offering fees and expenses.

**Periodic Fees.** Periodic fees include IRA custodial fees, brokerage fees (i.e., account maintenance and order handling fees), and a portion of the fees associated with certain banking products and services (i.e., personal trust services).

Sales charges, trading commissions, markups, markdowns and financial planning and advisory services fees are not eligible for reimbursement or offered at a discount.

**Periodic expenses.** Periodic expenses are paid from product assets, such as 12b-1 shareholder servicing fees paid from mutual fund assets (including 12b-1 fees paid on certain funds that serve as underlying investment options for 529 plan assets) and distribution fees paid from Ameriprise Certificate Company assets. 12b-1 shareholder servicing fees assessed in Ameriprise brokerage accounts may be used to pay for marketing, distribution and shareholder service expenses. Any 12b-1 shareholder servicing fees received for the share class utilized in any Managed Accounts will be rebated to clients.

**Ameriprise Preferred Line of Credit.** Ameriprise Financial Services receives compensation from Ameriprise Bank of 0.25% on an annualized basis of the amount of the credit line outstanding balance. This amount is shared with your Ameriprise financial advisor based on how your advisor is affiliated with us and on the payout rate for which your financial advisor qualifies. These affiliations and compensation structures are described in the “**How our financial advisors get paid**” section of this Brochure.

**Ameriprise Bank Savings Account.** Ameriprise Financial Services receives compensation from Ameriprise Bank of 0.05% on a monthly basis of the amount of the average monthly balance. This amount is shared with your Ameriprise financial advisor based on how your advisor is affiliated with us and on the payout rate for which your financial advisor qualifies. These affiliations and compensations structures are described in the “**How our financial advisors get paid**” section of this Brochure.

**Payments for referrals to structured settlements annuity brokers.** Ameriprise Financial Services receives a fee, shared with financial advisors, for referrals to non-affiliated structured settlement professionals for both client and non-client referrals. The amount and basis for the referral fee varies by relationship multiplied by the notional sales amount of the product.

## Financial interest in products

Ameriprise Financial Services has a financial interest in the sales of proprietary products that are manufactured by its affiliates. Ameriprise Financial Services and its affiliates receive more revenue from the sale of some financial products and services, particularly those products and services sold under the Ameriprise, Columbia Threadneedle Investments and RiverSource brands, than for the sale of other products and services.

Generally, Ameriprise Financial Services receives more revenue for securities or products sold in a fee-based account than for those sold with only a sales charge or commission. Higher revenue generally results in greater profitability for Ameriprise Financial Services. Employee compensation (including management and field leader compensation) and operating goals at all levels of the company are tied to the company’s success. Management, sales leaders and other employees generally spend more of their time and resources promoting Ameriprise, Columbia Threadneedle Investments and RiverSource branded products and services.

## Economic benefits of affiliates’ products and services

As with all financial services firms, a portion of our revenue and compensation can generate a profit for the firm. The revenue and compensation we receive helps us cover our expenses in providing and servicing these products and services. Employee and financial advisor compensation and operating goals at all levels of Ameriprise Financial, Inc. are tied to the success of its businesses. As a result, certain incentives and conflicts of interest may exist for Ameriprise Financial Services, our affiliates and our financial advisors if you purchase certain products or services recommended by your financial advisor.

Generally, among other things, Ameriprise Financial Services and our affiliates will receive:

- More revenue, in aggregate, from the purchase of products sponsored or managed by Ameriprise, Columbia Management and RiverSource (“proprietary products”) than from the purchase of products sponsored or managed by firms that aren’t affiliated with Ameriprise Financial, Inc. (“nonproprietary products”). Ameriprise Financial Services actively promotes the products of our affiliates through advertising, direct mail, and product support and training events.
- More revenue from the purchase of products and services than from Wrap Fees.
- More revenue as the size of any margin account or Ameriprise Preferred Line of Credit balance increases.
- More revenue when you purchase certain types of products, such as insurance and annuity products and direct investments.
- More revenue from products and services that generate ongoing revenue streams, such as mutual funds that pay ongoing 12b-1 fees, an investment advisory account service, and insurance and annuity products with mortality and expense charges.
- More revenue when you purchase shares of mutual funds or 529 plans from Full Participation Firms than from firms with other distribution support relationships, as described in the “**Cost reimbursement services and third-party payments**” section of the *Ameriprise* Managed Account Client Disclosure Brochure.
- More revenue when you purchase investment products for which we receive cost reimbursement payments or have similar financial arrangements, as described in the “**Cost reimbursement services and third-party payments**” and “**Revenue sources for Ameriprise Financial Services, LLC**” sections of the *Ameriprise* Managed Account Client Disclosure Brochure.
- Less revenue when a sales charge or commission is reduced or waived completely, or where there is no sales charge.
- More revenue when you move assets (including retirement plan accounts) from another institution to Ameriprise Financial Services or RiverSource or into a product managed by Columbia Management or another affiliate.

Generally, among other things, your financial advisor may earn:

- More depending on how your financial advisor is affiliated with Ameriprise Financial Services, as described in the “**How our financial advisors get paid**” section of this Brochure.
- More on the sale of certain fixed life and disability insurance products because of special compensation programs that provide increasing levels of compensation the more a financial advisor sells of these products from each individual insurance company.
- More on the purchase of annuity and insurance products and direct investments, because they are more complex than other products and take more time to service.
- More revenue from products and services that generate ongoing revenue streams, such as mutual funds that pay ongoing 12b-1 fees, an investment advisory account service, and insurance and annuity products with mortality and expense charges.
- More from certain sales incentive programs to increase overall assets under management.
- Less on individual purchases within a transaction- based brokerage account because of the higher transaction charges your financial advisor pays on these accounts compared to a fee-based investment advisory account.
- Less when a sales charge or commission is reduced or waived completely, or where there is no sales charge.
- Typically, less when you exchange an existing annuity contract, mutual fund or insurance policy for certain like or similar products from the same company, unless you have held the existing product for a certain period of time.
- More revenue if you purchase securities on margin that you could not otherwise purchase in a cash account.
- Nominal additional compensation on the value of the assets rolled into an IRA brokerage account from a retirement account with Columbia Funds.
- A higher payout rate based on the level of product sales, on the number of financial plans sold, and on higher face value and/or death benefit amount for certain insurance products.
- More when you move accounts (including retirement plan accounts) from another institution to Ameriprise Financial Services, CMIA or RiverSource.
- If your financial advisor is a shareholder of Ameriprise Financial through our deferred compensation program, more compensation the more profitable the firm is.



- Compensation for servicing trust accounts held with the Ameriprise Bank.
- Compensation for performing certain activities associated with your mortgage if that loan is purchased and serviced by Ameriprise Bank.
- Compensation for providing services related to your Ameriprise Preferred Line of Credit based on an annualized fixed percentage of the client's average daily outstanding balance.
- Compensation for your Ameriprise Bank Savings Account balances based on an annualized fixed percentage of the client's average monthly balance.
- Compensation for marketing that leads to your opening of a co-branded credit card account provided you activate the card and meet the initial spend requirements.
- No compensation for the sale or renewal of *Ameriprise* Certificates.

Financial advisors are required to take training on complex products developed by Ameriprise Financial Services and its affiliates and non-affiliated product manufacturers, prior to soliciting, including certain RiverSource insurance and annuity products and a targeted subset of nonproprietary products. Additional general product training is available and specific product training is required for a number of complex products, including Columbia Threadneedle Investments and RiverSource branded products. It is likely that a product recommendation from your financial advisor will be drawn from the universe of products on which they were trained. Ameriprise Financial Services may enter into strategic alliances with companies that offer products or services that Ameriprise Financial Services and its financial advisors do not sell. As part of those alliances, Ameriprise financial advisors may receive gifts or non-cash compensation from the other companies, which are subject to SEC and FINRA regulations as well as Ameriprise Financial Services' internal compliance policies.

Some, but not all, of the software tools available for use by your financial advisor were developed by Ameriprise Financial Services or by unaffiliated third parties and may make it more convenient for your financial advisor to select proprietary products.

Most Ameriprise financial advisors are also appointed agents of RiverSource Life Insurance Company and, in New York only, RiverSource Life Insurance Co. of New York, affiliates of Ameriprise Financial Services.

Ameriprise Financial Services grants RiverSource limited access to Ameriprise financial advisors and provides RiverSource with limited information related to Ameriprise clients to promote sales of RiverSource products and to assist financial advisors in understanding the features and benefits of those products. Ameriprise Financial Services does not grant this access to other non-affiliated companies offering similar products, thus they do not have the same access to financial advisors as RiverSource.

Additionally, it is possible that Ameriprise Bank would send an order on behalf of a trust account to AEIS and at the same time AEIS would execute the opposite order for a brokerage client. Investments may be made for Ameriprise Bank's trust accounts in which Ameriprise Financial Services or its related persons have a position or interest. Although Ameriprise Financial Services and its related persons may own securities suitable for or held by clients, in no case will holdings of Ameriprise Financial, Inc., its subsidiaries or their employees or directors be directly sold to or purchased from Ameriprise Bank's trust accounts. AEIS, an affiliate of Ameriprise Financial Services, may buy or sell for its own account securities that Ameriprise Financial Services may recommend for Ameriprise Bank's trust accounts.

Ameriprise Financial Services does not anticipate that conflicts of interest will arise because we have adopted policies and procedures prohibiting Ameriprise Financial Services and our related persons from engaging in trading activity that creates a conflict of interest with our clients, as discussed in the **"Code of Ethics, Participation or Interest in Transactions and Personal Trading"** section.

## How our financial advisors get paid

An Ameriprise financial advisor is assigned to every investment advisory service. Ameriprise financial advisors have a wide range of business and educational backgrounds. They are required to have appropriate licenses and registrations to transact business, including Financial Industry Regulatory Authority ("FINRA") registration, required state securities and insurance licenses and carrier appointments and, where required, a state investment adviser representative registration.

Many financial advisors hold advanced academic degrees and/or professional designations, including the Certified Financial Planner™ (CFP®) designation. In addition, ongoing training is available to financial advisors. **For additional important information about an advisor check FINRA BrokerCheck at [www.finra.org/brokercheck](http://www.finra.org/brokercheck) or call 800.289.9999.**

Your financial advisor earns a living by providing you with financial advice and product recommendations to suit your goals. To understand how your financial advisor gets paid, you should first know that there are four ways Ameriprise financial advisors can be affiliated with us.

- **Independent contractor franchisees.** These financial advisors are not employed by Ameriprise Financial Services and they do not receive a salary from us.
- **Employee financial advisors.** These financial advisors are employed by Ameriprise Financial Services.
- **Associate financial advisors.** These financial advisors are employed by or contract with the independent contractor franchisees and they do not receive a salary or other compensation from Ameriprise Financial Services.
- **Financial institution employee financial advisors.** These financial advisors are employed by the financial institution where they provide services and are compensated by the financial institution from the portion of fees and commissions it receives from Ameriprise Financial Services. The financial institution serves as paying agent for such compensation on our behalf in accordance with applicable law. Financial institution employee financial advisors' compensation is based on their employment agreement with the financial institution.

All Ameriprise financial advisors are licensed registered representatives. Depending on the affiliation, our financial advisors are compensated differently. Financial advisors may choose to change how they are affiliated with Ameriprise Financial Services over time.

**Salary.** In addition to the fees described below, employee financial advisors may receive a salary or wage from Ameriprise Financial Services. Associate financial advisors may receive either a salary or a flat fee from the independent contractor franchisee for whom they work, at the discretion of the employing or contracting independent contractor franchisee.

Financial advisors may also have the potential to receive bonus compensation.

**Advisory fees and compensation.** The RPCS Fee and any applicable Advisory Fee you pay in your Managed Account is shared between Ameriprise Financial Services and your financial advisor as further described below.

A portion of the RPCS Fee and Advisory Fee is paid to your financial advisor for introducing you to the service, gathering the information necessary to prepare your service, helping you establish needs and goals, preparing and presenting your service, and/or providing financial advice on behalf of Ameriprise Financial Services.

The remaining portion of the fees goes to Ameriprise Financial Services for the supervisory, technical, administrative and other support that is provided to all financial advisors.

The portion of fees retained by Ameriprise Financial Services differs by the type of investment advisory program.

The actual portion of the RPCS Fee and Advisory Fee paid to your financial advisor depends on the payout rate for which your financial advisor qualifies and the amount of Asset-based Fees you pay. Only a component of the Asset-based Fee, the Advisory fee, is shared with your financial advisor.

- Independent contractor franchisees generally receive 72% to 91%, and employee financial advisors generally receive 0% to 46% of the advisory service fees and product commissions we receive (the "advisor payout rate").  
In addition, the financial advisor may qualify for a bonus which could increase the effective advisor payout rate up to 91% for independent contractor franchisees and 57% for employee financial advisors, respectively.
- Financial institution employee financial advisors generally receive an advisor payout rate of 0% to 91% based on their employment agreement with the financial institution.
- If you are a client of the Ameriprise Advisor Center, your financial advisor does not receive a portion of the fees but may receive compensation in the form of a bonus based in part on revenue generated through your RPCS Fee or Advisory Fee.
- In general, fees generated by an associate financial advisor are paid to the employing or contracting independent contractor franchisee. At the discretion of the employing or contracting independent contractor franchisee, the associate financial advisor may receive financial advisory or referral fees or a bonus.

The compensation programs for our financial advisors may vary based on, among other factors, the financial advisor's industry experience, tenure with Ameriprise Financial Services, the type of practice structure (solo or team), and whether the financial advisor was formerly associated with a firm acquired by Ameriprise Financial, Inc.



Ameriprise Financial Services offers a vast range of investment solutions to clients. Some products and services may be offered only by certain Ameriprise financial advisors. Discuss with your financial advisor the products he or she offers and the compensation your financial advisor receives, as some investment product companies and issuers, including RiverSource, may pay higher compensation than others.

Our financial advisors primarily offer life, and disability insurance and annuity products from RiverSource and certain pre-approved, but unaffiliated, insurance companies. However, in some situations where the client's needs may be met more effectively by another company's product, and RiverSource and other pre-approved providers do not offer such a product, Ameriprise financial advisors may offer insurance products issued by unaffiliated insurance companies.

If an unaffiliated insurance product is offered, the financial advisor is an appointed agent of the insurer and receives, directly or indirectly, compensation from the unaffiliated insurer for the sale and service of that product. The compensation for these nonproprietary products and RiverSource products is separate from, and in addition to, any fee you pay for investment advisory services and may vary depending on the type and size of the life insurance or annuity product that you purchase, the insurer that issues the product, and other factors. This compensation typically will increase as the size of the insurance policy or annuity contract increases, or the amount of the payments that you make on the life insurance or annuity product increases. Generally speaking, the compensation that the financial advisor will receive is calculated by a formula. Compensation may also increase as the financial advisor sells increasing amounts of life and disability income insurance products issued by that insurer.

In instances where a customer already owns a financial product sold by Ameriprise Financial Services, the amount of a financial advisor's compensation may vary in connection with the sale of an additional or replacement product, due to formulas relating to the cancellation of a product that is already owned.

As a result, the financial advisor in such a transaction may have an incentive to recommend the purchase of additional or replacement insurance or annuity products or, conversely, an incentive to recommend that you not purchase additional or replacement insurance or annuity products, depending on the relevant compensation formula.

Your financial advisor receives compensation for the marketing that leads to your opening of a co-branded credit card account provided you activate the card and meet initial spend requirements.

Ameriprise financial advisors will earn compensation for providing services related to your Ameriprise Preferred Line of Credit based on an annualized fixed percentage of the client's average daily outstanding balance.

Your financial advisor will receive compensation for performing certain activities associated with your mortgage if that loan is purchased and serviced by Ameriprise Bank.

Your financial advisor receives referral fees when you purchase and maintain Ameriprise Auto and Home insurance products under a long-term distribution agreement between Ameriprise Financial Services, American Family Insurance Group and Ameriprise Auto & Home. Ameriprise Auto & Home is not affiliated with Ameriprise Financial Services and is owned by the American Family Insurance Group. However, Ameriprise Auto & Home Insurance and the associated logo are being used by American Family Insurance Group under a temporary license from Ameriprise Financial.

If Ameriprise Bank accepts a trust based upon a referral from your financial advisor, Ameriprise Financial Services will receive a referral fee from the Bank. A portion of this referral fee is shared with your financial advisor. The referral fee is paid by the Bank from the fees earned for its services and is not an additional cost to the trust account. Your financial advisor also receives a referral fee for referrals to non-affiliated structured settlement professionals for both client and non-client referrals.

**Incentives, training and education.** Product companies with which we have agreements work with Ameriprise Financial Services and our financial advisors to promote their products. They may pay for training and education events or due diligence meetings; and may reimburse expenses for prospecting events such as seminars for employees, financial advisors, clients and prospective clients. For employees and financial advisors, these events may be held at off-site locations, and the travel, meals and accommodations may be paid for by the product company. Additionally, product companies may occasionally provide business or recreational entertainment or gifts of nominal value to employees and financial advisors.

Ameriprise Financial Services or sales leaders may, from time to time, offer contests or incentive programs to individual financial advisors or groups of financial advisors in particular areas. These contests and programs are limited to such targets as new client acquisition, financial plan count, net flows, total assets under management and financial advisor recruiting.

Single product or product categories are not eligible for sales contests or incentive programs with the exception of fixed life and disability insurance. These programs and incentives and the receipt of other cash/noncash compensation could affect your financial advisor's recommendations of products and/or services to you. These programs and incentives and other cash and/or noncash compensation are subject to SEC and FINRA regulations as well as Ameriprise Financial Services' internal compliance policies.

Ameriprise Financial Services from time to time recruits financial advisors from other firms to join Ameriprise Financial Services. In connection with these recruiting efforts, Ameriprise Financial Services may enter into arrangements with financial advisors for the payment of compensation and/or loans based upon the value of eligible assets or accumulated production of the recruited financial advisor at a pre-determined measurement date. The funds may be payable immediately, over time, as a bonus, or as a loan. These arrangements may have been structured to include a provision requiring that payment of transition compensation and/or loans would be dependent upon the advisor meeting certain agreed-upon production and/or asset level benchmarks. The financial incentives associated with these transition arrangements could influence the type and amount of product and/or service recommended by your financial advisor. Ameriprise Financial Services manages this conflict of interest by supervising the suitability of recommendations made by its financial advisors in accordance with all applicable regulatory requirements. Please review your financial advisor's Form ADV brochure supplement or ask your advisor if you have questions about whether these transition arrangements apply to them.

From time to time, Ameriprise Financial Services also provides compensation to financial advisors in connection with the sale of all or a portion of their client base to an Ameriprise financial advisor. Some of this compensation may be dependent on a certain percentage of the client base remaining as clients of Ameriprise Financial Services for a certain period of time. It is also determined based on valuations of the financial advisor's practice, or book of business.

The practice valuation formula results in higher compensation for revenues received from Managed Accounts versus Ameriprise brokerage accounts. As a result, your financial advisor has an incentive to recommend the opening of new Managed Accounts or the investment of additional assets into existing Managed Accounts or, conversely, an incentive to recommend that you not open an Ameriprise brokerage account or invest additional assets into a brokerage account. In addition, if your financial advisor is selling all or a portion of their practice to another Ameriprise financial advisor, this program could incent your financial advisor to recommend you remain a client of the acquiring financial advisor and/or Ameriprise Financial Services.

**Ameriprise Financial, Inc. equity programs.** We encourage our financial advisors to take an ownership stake in our future by holding stock in our parent company, Ameriprise Financial, Inc. (NYSE: AMP). To make this possible for financial advisors, we have created equity compensation programs for them. Employee financial advisors and independent contractor franchisees may be eligible to receive an annual stock bonus. In addition, independent contractor franchisees may be eligible to defer a certain percentage of their compensation each year. They may choose to invest all or portion of this deferral into a notional account that tracks the performance of Ameriprise Financial, Inc. stock.

Financial advisors who are independent contractor franchisees may build equity in their practices and may receive payments if they sell all or a part of their practices to other Ameriprise financial advisors.

**Loan programs.** Clients may have access to information about lending products and services through marketing and/or lending relationships Ameriprise Bank has with third-party financial institutions. Financial advisors do not earn compensation related to the origination or referral of lending products (e.g., mortgages) offered and originated by third-party providers.

Ameriprise Bank partners with Embrace Home Loans, Inc. (NMLS#2184) that offers mortgage lending products and services. Ameriprise Financial Services and Ameriprise financial advisors do not accept any mortgage loan applications or offer or negotiate terms of any such loans. Financial advisors do not earn compensation related to the origination or referral of mortgage lending products offered and originated by such third-party providers. Ameriprise Bank may purchase and service some loans originated by Embrace Home Loans, Inc. Ameriprise Financial Services and Ameriprise financial advisors may receive compensation for assisting clients with mortgages serviced by Ameriprise Bank. Ameriprise Financial, Inc. is not affiliated with Embrace Home Loans, Inc. Ameriprise Bank does not guarantee products or services offered by Embrace Home Loans, Inc.

Ameriprise Bank has partnered with Elan Financial Services to make available Ameriprise co-branded credit cards. Your financial advisor receives compensation for marketing efforts that leads to your opening of a co-branded credit card account provided you activate the card and make sufficient purchases.

Ameriprise Bank has partnered with Goldman Sachs to make available the Ameriprise Preferred Line of Credit. Ameriprise financial advisors will earn compensation for providing services related to your Ameriprise Preferred Line of Credit based on an annualized fixed percentage of the client's average daily outstanding balance. With the exception of margin lending, offered by AEIS, neither your Ameriprise financial advisor nor Ameriprise Financial Services may arrange, promote, suggest or knowingly permit you to use loan proceeds to purchase securities or other investment products.

**Advisor-to-advisor training programs.** Ameriprise Financial Services or its affiliates may also pay its financial advisors for training other financial advisors on specific products and services that we offer. A portion of this payment may be based on incremental sales of these products and services sold by the financial advisor receiving the training.

**Shared compensation.** Financial advisors may also choose to work together as a team to share fees and commissions generated from products and services you purchase. The cost of the product or service you purchase is not affected by the fact that your financial advisor is a member of a team or by the fact that the fee or commission may be split. Your financial advisor may be allowed to share a portion of the Wrap Fee he or she receives with one or more other Ameriprise financial advisor(s), including financial advisors who have not completed the Ameriprise Financial Services-required training to sell the investment advisory service, franchise consultants or registered principals, as described below.

In cases where two or more financial advisors are assisting you, both financial advisors may share in the Wrap Fee. Your servicing financial advisor will present the Managed Account or RPCS, set the Wrap Fee, and oversee the analysis and advice prepared for you. Your servicing advisor may or may not be the financial advisor authorized to use discretion to purchase and sell securities in your account, e.g., your SPS Discretionary Advisor. In the instance that your servicing advisor is not authorized to use discretion, the financial advisor authorized to use discretion will oversee the analysis and advice prepared for you. Only the financial advisor authorized to use discretion will purchase and sell securities in our Account.

Your servicing advisor may or may not be the financial advisor who has completed the required training. A financial advisor who has not completed the required training may refer a client to a financial advisor who has completed the required training for the service or product. The financial advisor who has completed the required training may pay a fee to the financial advisor who has not completed the required training for that referral. The financial advisor who has not completed the required training may provide investment advisory services for services and products that do not require training, however, only the financial advisor who has completed the required training required for a particular service or product will provide the analysis and advice prepared for you with respect to a service or product that requires the training. The financial advisor who has not completed the required training may receive a share of the commission from any services or products sold to you by your financial advisor who has completed the required training.

Your financial advisor may work with a franchise consultant. In those situations, the franchise consultant, who is registered with Ameriprise Financial Services, may receive compensation based on services and products that you purchase, and for the training and leadership of your financial advisor. The cost of the product or service you purchase is not affected.

Your financial advisor may employ staff or work with other Ameriprise Financial Services staff to assist with creating your financial planning recommendations. This may include leveraging services in geographic locations outside of your financial advisor's location, including international locations.

Services provided may include entering data into financial planning software, providing initial calculation and assistance in creating solutions. Your financial advisor will provide final recommendations to you. For these services your financial advisor may pay a fee or salary to employed staff.

Financial advisors and field leaders may share compensation with their registered support assistants or recommend bonuses for their non-registered support staff.

Employee financial advisors and selling leaders may receive continuing commissions and fees for the sale of certain products and services for up to five years after leaving the securities industry.

Ameriprise offers a Business Development Account (BDA) Program. Eligible employee financial advisors may create a voluntary BDA in a predetermined amount and use this account for business-related expenses above and beyond what the company provides.

**Management compensation and bonus programs.** Employee compensation and operating goals at all levels of the company are tied to the company's success. All employees, directly or indirectly, may receive higher compensation and other benefits when the investment products of certain providers, particularly affiliates, are purchased. Management, sales leaders and

other employees spend more of their time and resources promoting Ameriprise, Columbia Threadneedle Investments, and RiverSource branded products and services.

Field leaders receive a salary and a bonus and are responsible for an operating budget for expenses. Bonus programs for Ameriprise Financial Services field leaders are designed to include an amount based on the aggregate sales of all products sold by financial advisors, including proprietary products, in the regions of the country those leaders are responsible for overseeing. The bonus incentive and expense programs present a potential conflict because they are based in part on sales of these products.

## Code of Ethics, Participation or Interest in Transactions and Personal Trading

### Code of ethics

As part of an overall internal compliance program, Ameriprise Financial Services has adopted policies and procedures imposing certain conditions and restrictions on transactions for the account of Ameriprise Financial Services and the accounts of our employees. Such policies and procedures are designed to prevent, among other things, any improper or abusive conduct when potential conflicts of interest may exist with respect to a customer or client. In addition, from time to time, restrictions are imposed to address the potential for self-dealing and conflict of interest which may arise in connection with the business of Ameriprise Financial Services as a broker-dealer. Ameriprise Financial Services has adopted various procedures to guard against insider trading.

### Participation or interest in client transactions

From time to time Ameriprise Financial Services and/or its affiliates and related persons may invest in the same or related securities that Ameriprise Financial Services and/or its affiliates recommend to clients. Such transactions may occur at or about the same time that such securities are bought or sold for client accounts. Ameriprise Financial Services has adopted policies and procedures imposing certain conditions and restrictions on transactions in these securities, such as trading blackout periods and preclearance requirements.

See the **“Financial interest in products”** subsection in the **“Revenue Sources for Ameriprise Financial Services, LLC”** section in this Disclosure Brochure for more information about our financial interest in the sale of certain products and services.

### Personal trading rules and procedures

Ameriprise Financial Services has adopted personal trading rules and procedures within the Ameriprise Financial Code of Ethics and Personal Trading Policy. These rules are designed to list standards of business conduct and to mitigate potential conflicts of interest for all persons of Ameriprise Financial Services when they engage in personal securities transactions. You may request a copy of the Ameriprise Financial Code of Ethics and Personal Trading Policy from your financial advisor or by contacting us at 800.290.6663.

The standards of business conduct include compliance with applicable laws and regulations and with policies and procedures such as those contained in the Ameriprise Global Code of Conduct. Under the personal trading rules, persons are required to report their personal securities holdings and transactions, including transactions in certain mutual funds; must pre-clear certain investments; are restricted with respect to the timing of certain investments; and are prohibited from making certain investments. In addition, the Personal Trading Policy requires (i) Ameriprise employee financial advisors and their employees, (ii) its independent contractor franchisee financial advisors and their employees, and (iii) its affiliated investment advisers to conduct most personal trades through one of three designated broker-dealers unless an exception has been granted, and report any changes in their selected broker-dealer.

### Insider trading policy

Ameriprise Financial Services and its related persons may, from time to time, come into possession of material nonpublic information that, if disclosed, might affect an investor’s decision to buy, sell or hold a security.

Under applicable law, Ameriprise Financial Services and its related persons are prohibited from improperly disclosing or using

such information for their personal benefit or for the benefit of any other person, regardless of whether such other person is a client. Accordingly, should Ameriprise Financial Services or its related persons come into possession of material nonpublic information with respect to any company, they may be prohibited from communicating such information to, or using such information for the benefit of, their respective clients, and have no obligation or responsibility to disclose such information to, nor responsibility to use such information for the benefit of, their clients when following policies and procedures designed to comply with law. Ameriprise Financial Services and its affiliates have adopted an “Insider Trading Policy” in accordance with Section 204A of the Advisers Act that establishes procedures to prevent the misuse of material nonpublic information by Ameriprise Financial Services and its associated persons.

## Brokerage Practices

Ameriprise Financial Services does not receive research or other products or services other than execution from any unaffiliated broker-dealer or other third party for client securities transactions. Ameriprise Financial Services receives and distributes research authored by its affiliate AEIS; however, this research is not provided for client securities transactions or for any other compensation. Nor do we or our affiliates receive client referrals from broker-dealers or third parties that are considered in selecting or recommending broker-dealers.

Retail brokerage services are not made available through Ameriprise Financial Services as part of RPCS.

## Review of Accounts

Certain supervisory functions are performed by Ameriprise Financial Services corporate office personnel. Corporate registered principals review a sampling of financial advisor’s recommendations, including written RPCS recommendations periodically based on certain key factors.

When appropriate, our corporate registered principals may also decide to call you directly to discuss your understanding of RPCS, including the fees and expenses you will be paying. Our Compliance department also conducts routine surveillance of financial advisor activities.

An important part of an RPCS engagement involves providing you with the opportunity to engage in periodic reviews with your financial advisor or a designated member of the team servicing your RPCS. In these reviews, you and your financial advisor should discuss any changes to your plan’s circumstances, financial situations, investment objectives and/or risk tolerance.

Our supervision and surveillance do not substitute for your continued review and monitoring of your RPCS services. You should review your account statements and other information we send to you. If you have any questions, please discuss them with your financial advisor.

## Client Referrals and Other Compensation

### Referral arrangements and other economic benefits

In certain circumstances your financial advisor may refer you to another retirement plan services provider. In this case, the advisory fees you pay the third-party retirement plan services provider are shared with Ameriprise Financial Services on a fully disclosed basis, as well as your financial advisor, as described in the “**How our financial advisors get paid**” section of this Brochure.

Ameriprise Financial Services maintains formal and informal arrangements, the terms of which are disclosed to the client, with individual professionals, professional firms, and select corporate, institutional or membership organizations (“Promoters”). For each such arrangement, Ameriprise Financial Services pays the Promoter for referral of their clients or members to Ameriprise Financial Services for its financial advisory services. The manner and amount of compensation to be paid in connection with these agreements is subject to negotiation between Ameriprise Financial Services and the applicable Promoter. Prospective clients are provided the applicable disclosures, including whether the Promoter is a client, the material terms of compensation (if any) and the material conflicts of interest (if any), that results from the Promoter’s relationship with Ameriprise Financial Services. The most common compensation arrangements include a flat fee at the time

of the referral, a recurring flat fee, or a sharing of a portion of any total Asset-based Fees. You will not be charged an additional fee as a result of any referral arrangements. Compensation may include a one-time payment or ongoing payments for the duration of the investment advisory relationship.

Ameriprise Financial Services may form alliances and networking arrangements with financial institutions such as community banks, credit unions, credit union service organizations, Farm Credit Services and trust service providers (“Third-Party Financial Institutions”) to allow its financial advisors to offer investment advisory services, financial planning services and certain other non-deposit investment and insurance products and services, (described elsewhere in this Brochure), to retail customers or members of the Third Party Financial Institutions. Under the terms of these alliances or networking arrangements, financial advisors may not be able to offer to retail customers or members of the Third-Party Financial Institutions certain products that are otherwise available through Ameriprise Financial Services or its affiliates. Also as a result of these alliances or networking arrangements, Third-Party Financial Institutions may receive, in the form of a networking payment, a portion of Asset-based Fees and securities and insurance commissions paid to financial advisors for sales to retail customers or members of the Third Party Financial Institutions.

Ameriprise Financial Services has entered in partnership with Renaissance Charitable Foundation Inc. (“RCF”) for the referral of clients or prospects that have indicated an interest in establishing and maintaining a donor advised fund made available through RCF. No referral fee is paid by RCF to Ameriprise Financial Services or financial advisors however donor advised funds established by RCF as a result of the referral generally invest in eligible Managed Account Programs that are advised and serviced by the referring financial advisor.

The administration fee that you pay RCF for a donor advised fund solution may be more or less than if you were to purchase the donor advised fund services from RCF or another non-profit organization. Any fees charged by RCF for the administration of the donor advised fund are not shared with Ameriprise Financial Services or financial advisors.

Ameriprise Financial Service and your financial advisor will receive Asset-based Fee revenue from a donor advised fund established by RCF and invested in a Managed Account Program and no revenue if donor advised fund assets are invested with a third-party investment adviser, whether through RCF or another non-profit organization. We seek to address this conflict of interest through a combination of disclosure and through our policies, procedures and supervision related to the determination that a referral to RCF is appropriate for you based on your Client Information, and by treating assets in Managed Accounts owned and administered by RCF and assets in Managed Accounts owned directly by you as separate and distinct advisory relationships in accordance with all applicable regulatory requirements.

## Review of issuers of financial products

Ameriprise Financial Services and its affiliates have policies and procedures in place to review the issuers of financial products such as alternative investments in non-traded REITs, non-traded BDCs and non-traded CEFs, structured notes, and annuity and insurance products that Ameriprise Financial Services permits its financial advisors to recommend to some or all of its clients. This review includes publicly available information and reports issued by third parties and may in some cases include certain nonpublic information provided by the issuer. Ameriprise Financial Services periodically reassesses, but does not continuously monitor, the creditworthiness or financial solvency of third-party issuers. These policies and procedures are reasonably designed to mitigate our clients’ exposure to credit and default risks resulting from an inability of the issuer to repay the principal on a note or fulfill an insurance obligation. However, you should be advised that credit markets can be volatile and the creditworthiness of an issuer may change rapidly. Ameriprise Financial Services, as a seller of these products, is prohibited by regulation from guaranteeing or providing any assurance that an issuer of financial products will be able to fulfill the issuer’s obligation to any purchaser of such a product through Ameriprise Financial Services.

## Revenue sources for RiverSource

**Sales charges.** You pay sales and other charges under RiverSource variable annuity contracts and life insurance policies. You may incur transaction costs or fees associated with structured annuities. You may pay a contingent deferred sales charge, or surrender charge, if you withdraw funds during the applicable period.

**Periodic fees and expenses.** You pay certain fees and expenses under RiverSource annuity contracts, life insurance policies and disability income insurance policies, including (depending on the type of contract or policy) mortality and expense, administrative, policy, contract, and cost of insurance fees or charges, in addition to costs associated with certain riders that may be available for both fixed, structured and variable products.



Periodic expenses are also paid from product assets, such as 12b-1 fees paid on certain funds that serve as underlying investment options for variable annuities and variable life insurance. 12b-1 fees may be used to pay for marketing, distribution and shareholder service expenses.

**Investment and interest income.** Investment and interest income from insurance company general account assets derived, in part, from the amounts you pay for insurance and annuity benefits.

**Variable annuity and variable life insurance financial arrangements.** RiverSource selects the funds available within your variable annuity contract or variable life insurance policy. In doing so, RiverSource may consider various objective and subjective factors. These factors include compensation RiverSource may receive from fund assets (for those funds with 12b-1 plans); assets of the fund's adviser, subadviser or an affiliate of either; and assets of the fund's distributor or an affiliate. This compensation benefits RiverSource.

The amount of this revenue varies by fund, may be significant and may create potential conflicts of interest for RiverSource. The greatest amount and percentage of revenue that RiverSource receives comes from assets allocated to subaccounts investing in funds managed by its affiliates, CMIA, and Columbia Wanger Asset Management. In general, the revenue directly related to assets under management that RiverSource receives currently ranges up to 0.65% of the average daily net assets invested in the underlying funds through the variable annuity or variable life insurance contracts RiverSource issues. This revenue is in addition to revenues RiverSource receives from the charges you pay when buying, owning or surrendering your variable annuity contract or life insurance policy. In accordance with applicable laws, regulations and the terms of the agreements under which such revenue is paid, RiverSource may receive this compensation for various purposes including financial advisor training and compensation, marketing and distribution, customer servicing, transaction processing, record keeping, and other administrative services.

## Revenue sources for Columbia Management and Threadneedle

**Periodic fees and expenses.** Columbia Management and Threadneedle International Limited may receive management fees and certificate advisory and services fees for services, including, with respect to Columbia Management, investment management services for *Active Portfolios*<sup>®</sup> investments. These revenues may be received from the Columbia Funds, Columbia ETFs, Columbia closed-end funds, Ameriprise certificates and from other affiliated and nonaffiliated advisory clients of Columbia Management and Threadneedle International Limited.

## Revenue sources for other Ameriprise Financial, Inc. companies

There are a number of other Ameriprise Financial, Inc. companies that will receive revenue from the charges and fees you pay, including the following:

- Ameriprise Certificate Company receives investment spread income earned on, and any early withdrawal penalty related to, Ameriprise certificates.
- Columbia Management Investment Services Corp. receives certain fees and expenses paid from the Columbia Funds and Ameriprise certificates in exchange for the transfer agent services it provides.
- American Enterprise Investment Services Inc. is compensated for its services through the brokerage commission and other fees charged for each brokerage transaction, which may include transactions made in a Bank trust account, or through the brokerage commission which is included in the overall asset-based fee, depending on the account option you select.
- If the Sweep Program for your Account is AIMMA, AEIS receives compensation from the Program Banks based on the cash balance in the AIMMA program. If your account sweeps uninvested cash to ABISA or to Ameriprise Bank as the Program Bank in the AIMMA program, Ameriprise Bank does not compensate AEIS, but reimburses AEIS for its direct out-of-pocket expenses related to the sweep services provided.
- AEIS receives compensation in the form of interest charged on your margin account balance as well as from order handling fees. In transaction-based brokerage accounts, AEIS may also engage in principal trading of certain types of fixed income securities for brokerage accounts—that is, it may buy and sell these securities for its own account with the objective of making a profit in certain circumstances, AEIS may buy these securities from you or sell these securities to you on a principal basis, in which case you will pay a markup or markdown on the transaction.
- AEIS performs, for the benefit of Ameriprise Financial Services, its financial advisors and clients, cost reimbursement and

marketing support services as described in the “Cost Reimbursement and Marketing Support” section. In recognition of the above, Ameriprise Financial Services will compensate AEIS for such services that are performed by AEIS.

- The capacity in which AEIS acts in any particular transaction is disclosed on each transaction confirmation you receive. AEIS is also compensated for the shareholder services it provides for certain mutual fund companies. These services include but are not limited to delivering shareholder communications such as updated prospectuses and statements of additional information, transaction confirmations and annual tax reporting, and monitoring compliance with share class, discounted sales charge, market timing and other mutual fund company policies.
- Ameriprise Financial, Inc. receives fees paid from Columbia and the Columbia Funds and Ameriprise certificates in exchange for the administrative services it provides.
- Columbia Management Investment Distributors receives fees paid from the Columbia Funds in exchange for the distribution services it provides. Ameriprise Financial Services has a financial interest in the sale of the Columbia Funds, Ameriprise certificates and RiverSource products and certain other mutual funds.
- Ameriprise Financial Services sells annuity and insurance products manufactured by its RiverSource affiliates, as well as products from unaffiliated providers. RiverSource is permitted to reimburse Ameriprise Financial Services for client/prospect education events and advisor sales meetings, seminars, and training events pertaining to annuity and insurance products, consistent with Ameriprise Financial Services policies and industry regulation;
- Ameriprise Financial Services may also receive nominal noncash benefits from time to time. Unaffiliated annuity and insurance providers may not provide some services, or the same level of services, to Ameriprise financial advisors. As a result, Ameriprise financial advisors may have a greater familiarity with RiverSource annuity and insurance products.
- Ameriprise Bank charges a fee, depending on the terms of trust documentation and applicable state laws governing trust administration for its administrative trust services that are separate from investment management fees charged by financial advisors and are not shared with Ameriprise Financial Services.
- When Ameriprise Bank is a Program Bank in the AIMMA program or ABISA is the Sweep Option, Ameriprise Bank earns income by lending or investing the deposits it receives and charging a higher interest rate to borrowers, or earning a higher yield, than it pays on the deposits held through these sweep programs. The difference is known as the "spread."
- Ameriprise Bank earns revenue based on the amount of credit extended and the interest rate on the Ameriprise Preferred Line of Credit.

## Custody

Ameriprise Financial services does not maintain custody of client funds or securities or take possession of any plan assets as part of RPCS.

## Investment Discretion

Your Ameriprise financial advisor does not manage plan assets, securities or other investments on your behalf as part of RPCS. Under RPCS your financial advisor provides investment advisory and consulting services on a non-discretionary basis.

## Voting Client Securities

Ameriprise Financial Services does not offer proxy voting services with respect to RPCS.

## Financial Information

We are not required to include a balance sheet in this Brochure because we do not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance.

We do not have any financial conditions that are reasonably likely to impair our ability to meet our contractual commitments to clients.

Ameriprise Financial Services has not been the subject of a bankruptcy petition during the past 10 years.



## Privacy Notices

Protecting your privacy is a top priority. Visit our Privacy, Security & Fraud Center at Ameriprise.com to understand our notices for how we collect, use, share and protect your personal information as well as to get answers to privacy-related questions.

## Glossary

- **“Advisers Act”** means the Investment Advisers Act of 1940, as amended.
- **“AEIS”** means American Enterprise Investment Services Inc.
- **“AFIG”** means Ameriprise Financial Institutions Group.
- **“Agreement”** means the applicable service agreement, as it may be amended from time to time, that includes the specific terms under which the client will receive those services.
- **“Ameriprise”** means Ameriprise Financial, Inc.
- **“Ameriprise Financial Services”, “Ameriprise Financial”, “AFSI”, “we”, “us” or “our”** means Ameriprise Financial Services, LLC.
- **“ATC”** means Ameriprise Trust Company.
- **“Bank”** means Ameriprise Bank, FSB.
- **“CD”** means a Certificate of Deposit.
- **“CFP®”** means Certified Financial Planner™ professional.
- **“CFTC”** means the Commodity Futures Trading Commission.
- **“CMIA” or “Columbia Management Investment Advisers”** means Columbia Management Investment Advisers, LLC.
- **“Columbia” or “Columbia Management”** refers, collectively, to Columbia Management Investment Advisers, LLC and Columbia Wanger Asset Management, LLC.
- **“Columbia Funds”** means investment companies and other funds advised by affiliated companies, Columbia Management Investment Advisers, LLC and Columbia Wanger Asset Management, LLC.
- **“CTA”** means Commodity Trading Advisor.
- **“ERISA”** means the Employee Retirement Income Security Act of 1974, as amended.
- **“FASB”** means the Financial Accounting Standards Board.
- **“FDIC”** means the Federal Deposit Insurance Corporation.
- **“FINRA”** means the Financial Industry Regulatory Authority.
- **“Internal Revenue Code”** means the Internal Revenue Code of 1986, as amended.
- **“IRA”** means an individual retirement account.
- **“IRG”** means Ameriprise Investment Research Group.
- **“NFA”** means National Futures Association.
- **“NYSE: AMP”** means Ameriprise Financial, Inc. stock symbol on the New York Stock Exchange.
- **“Outside Workplace Retirement Plan”** means additional retirement plan assets held outside of Ameriprise Financial Services in a participant-directed defined contribution plan.
- **“Plan Fiduciary” or “Plan Fiduciaries”** means employers and trustees of the plan enrolled in RPCS.
- **“RiverSource”** refers, collectively, to RiverSource Life Insurance Company and RiverSource Life Insurance Co. of New York.
- **“RPCS”** means Retirement Plan Consulting Service.
- **“RPCS Fee”** means the fee you pay for investment advice and services for RPCS.
- **“SEC”** means the United States Securities and Exchange Commission.
- **“SIPC”** means the Securities Investor Protection Corporation.
- **“Solicitor”** means individual professional, professional firm, and select corporate, institutional or membership organization to whom compensation is paid for referral of clients or members to Ameriprise Financial Services for its financial advisory services.

- **“Third Party Financial Institutions”** means third-party financial institutions such as community banks, credit unions, credit union service organizations and Farm Credit Services with whom Ameriprise Financial Services may form alliances and networking arrangements with to allow its financial advisors to offer financial planning services and certain other non-deposit investment and insurance products and services, to retail customers/members of the Third Party Financial Institutions.

## About Ameriprise

A tradition of commitment since 1894. A legacy of putting clients first.

For more than 125 years, Ameriprise has been committed to putting our clients' needs first. Our advisors develop ongoing one-to-one relationships and take time to understand what's truly important to clients and their families.

We offer a comprehensive approach to financial planning that helps our clients feel confident, connected and in control of their financial life.

**This Brochure provides information about the qualifications and business practices of Ameriprise Financial Services, LLC. If you have any questions about the contents of this Brochure, please consult with your financial advisor or contact us at 800.862.7919 between 7 a.m. and 6 p.m. Central time. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Ameriprise Financial Services, LLC's California insurance license number is 0684538.**

**Additional information about Ameriprise Financial Services, LLC also is available on the SEC's website at [adviserinfo.sec.gov](http://adviserinfo.sec.gov).**



**Financial Planning | Retirement | Investments | Insurance | Banking**

Ameriprise Financial  
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