

# ERISA 408(b)(2) fee disclosure guide for retirement plan clients holding accounts at Ameriprise Financial

This document describes information about fees and other compensation Ameriprise Financial Services, LLC (“Ameriprise Financial,” “us” or “we”), our affiliates, financial advisors and subcontractors, reasonably expect to receive in connection with services provided to your plan. This information is intended to be sufficient to comply with the Department of Labor regulation on reasonable contracts or arrangements (the “Regulation”) under section 408(b)(2) of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”).<sup>1</sup> This information is being provided to you in your role as the plan fiduciary responsible for selecting service providers for your plan.

The Regulation requires us to provide information to plans subject to ERISA. However, because it is difficult for us to determine if a particular plan is subject to ERISA, we are providing this disclosure to employer sponsored retirement plans that we think could be subject to the Regulation.<sup>2</sup>

Our fees will vary depending on a number of factors outside of our control such as the amount of contributions you make to the account, the duration you keep the account with us, the investments you select within the account, the frequency at which you trade within the account, your investment performance and any special services you require.

Below is a summary of the various services we may provide to your plan as well as related fees that we receive either directly from your account or indirectly in connection with the investments that you purchase in your account.

The summary also shows you the indirect fees paid to our financial advisors, affiliates and subcontractors where those fees are either paid on a transaction basis or are charged directly against your investment and reflected in the net value of the investment. Further descriptions of the services we provide may be found in the Client Relationship Guide, the Ameriprise Brokerage Client Agreement, Working in Your Best Interest – Regulation Best Interest and your brokerage

relationship with Ameriprise Financial, Other Important Brokerage Disclosures, Ameriprise Financial Schedule of Account and Service Fees, the Managed Accounts Client Disclosure Brochure and the Investor’s Guide to Purchasing Mutual Funds through Ameriprise Financial, all of which can be accessed on our website and are incorporated by reference into this guide:

- Client Relationship Guide, Working in Your Best Interest – Regulation Best Interest and your brokerage relationship with Ameriprise Financial, and the Managed Accounts Client Disclosure Brochure: These documents are available at [ameriprise.com/disclosures](http://ameriprise.com/disclosures)
- Investor’s Guide to Purchasing Mutual Funds: [ameriprise.com/content/files/AMP\\_200757.PDF](http://ameriprise.com/content/files/AMP_200757.PDF).
- Information related to individual mutual funds can be found on our secure site. Login or register at: <https://my.ameriprise.com/access/authreg/research?reqPage=News&reqTab=newsHeader> or go to morningstar.com (use ticker to find prospectus and other SEC documents).

If you would like a paper copy of any of these documents (including a mutual fund prospectus or Statement of Additional Information (“SAI”)) or need help navigating our website to obtain your own copy, email us at [Ameriprise.Retirement.Plan.Products@ampf.com](mailto:Ameriprise.Retirement.Plan.Products@ampf.com). You may also email us at this address if you have additional disclosure questions.

Please note, your plan may be subject to fees paid to other service providers such as third party administrators not affiliated with Ameriprise Financial. For a complete list of such fees charged to your plan, please contact all plan service providers with whom you contract or may contract and request fee information with respect to their services.

<sup>1</sup> This document may also be used to satisfy the disclosure requirements of one or more exemptions from the prohibited transaction restrictions of ERISA, including, but not limited to, Prohibited Transaction Exemption 84-24, 49 Fed. Reg.13208 (Apr. 3, 1984), as amended at 71 Fed. Reg. 5887 (Feb. 3, 2006) and as amended at 81 Fed. Reg. 21147 (June 7, 2016).

<sup>2</sup> Even if your plan is not subject to ERISA, you may still find this information helpful. However, some of the information contained herein relates only to ERISA plans. For example, if your plan is not subject to ERISA we will not and cannot act as an ERISA fiduciary.

## I. General description of services provided

Ameriprise Financial makes a broad range of products and services available to clients including clients who sponsor qualified retirement plans. Ameriprise Financial offers two basic service levels to qualified plan clients: “investment only accounts” and “custodial 401(a) accounts”.

For investment only accounts, Ameriprise Financial provides investment products and services solely to the plan’s trustee. With this type of account, the plan’s trustee (who is usually an officer or owner of the company sponsoring the retirement plans) is the owner of the account and Ameriprise Financial takes instructions from the plan’s trustee except in limited circumstances. The plan’s trustee is responsible for tax reporting and all plan administration. If desired, the plan’s trustee can set up individual accounts for each of the plan’s participants and can also give participants the right to direct the investment of their own account. Investment only accounts are subject to product and service fees in the same manner as any other account ownership type. Ameriprise Financial does not offer any administrative or plan document support for such accounts.

The custodial 401(a) account is similar to investment only accounts but adds an additional service. Ameriprise Trust Company acts as a passive custodian for these accounts by assisting with distributions, including the associated federal tax reporting and federal tax withholding. For this additional service, Ameriprise Trust Company may charge a custodial fee of up to \$100 per participant, per year.

Regardless of whether your plan holds investment only accounts or custodial 401(a) accounts, your financial advisor is compensated for introducing you to the available products and services, gathering the information necessary to prepare your service or determine that a product is suitable for you, helping you establish needs and goals, preparing and presenting your product or service, and/or for providing ongoing account servicing on behalf of Ameriprise Financial. Your financial advisor’s compensation varies depending on the products and services you purchase. A more detailed description of how your financial advisor is compensated can be found in Section II of this guide.

## II. Products and services

Most of the compensation we receive is related to the products and services you purchase within your account.

Clients who invest at Ameriprise Financial through their qualified plan have access to a broad range of investment products and services, each of which are subject to different fee structures, and which are described in the Client Relationship Guide, Other Important Brokerage Disclosures, Managed Accounts Client Disclosure Brochure and Investor’s Guide to Purchasing Mutual Funds as applicable. As a general rule, within these various fee structures clients with custodial 401(a) accounts or investment only accounts pay the same fees and receive the same services as individuals who invest at Ameriprise Financial outside of a qualified plan.

## A. Advisory (Managed) accounts

*Ameriprise*<sup>®</sup> Advisory Solutions provide managed accounts with an asset-based fee structure that allows you to receive guidance and implement your personalized investment strategy — without incurring individual trading costs at the time of purchase or sale. Although you will not incur trading costs, you will pay an agreed upon annual asset-based advisory fee. For example, if you negotiate a 2.0% annual asset-based fee, you would pay \$200 for each \$10,000 of advisory assets held in your managed account. Further information on the asset-based fees applicable to advisory accounts may be found in the Managed Accounts Client Disclosure Brochure, available at the website noted above. The asset-based fee specific to your account may be found in your application or subsequent asset-based fee confirmations. A portion of that asset-based fee will be paid to your financial advisor subject to the payout rate described in Section V. A. Information on how the asset-based fees paid in connection with each program within the Advisory Solutions will be allocated among Ameriprise Financial, your financial advisor, and, if applicable, the investment manager of the advisory program is detailed in the “Allocation of Asset-based Fees” section of the Managed Accounts Client Disclosure Brochure.

The asset-based fee, however, does not include fees and charges that you will be responsible and charged for separately, such as:

- Brokerage commissions resulting from transactions effected through or with a broker-dealer other than our affiliated clearing broker dealer American Enterprise Investment Services, Inc. (“AEIS”);
- Transaction fees relating to any foreign securities other than American Depositary Receipts (ADR), ADR issuance and annual depository fees;
- Voluntary reorganization fees;
- Fees and expenses associated with your sweep account as further described below;
- Other costs or charges imposed by third parties, including odd-lot differentials, transfer taxes, exchange fees and other fees or taxes required by law including a nominal transaction fee on sales of all equity and most option positions.

You will also be subject to product-specific fees if you invest in mutual funds or other investment products that contain embedded fees. These embedded fees can include investment management fees paid to a mutual fund adviser and other fees detailed in the sections below relating to each specific product.

Furthermore, we will receive indirect compensation from those product providers in the form of marketing support payments, sub-transfer agent fees, and other compensation as described in the following sections of this guide.

For detailed information related to the advisory programs including a description of the services provided and the compensation we receive, please review the Managed Accounts Client Disclosure Brochure.

## **B. Brokerage accounts**

If you choose to open a brokerage account rather than an advisory account, transaction based fees will be charged to your account when you purchase or sell an investment. Equities, Exchange Traded Products ("ETPs"), Exchange Traded Funds ("ETFs"), and Options: When you purchase or sell equities, ETPs, ETFs, and options in a brokerage account, you will pay a sales commission. Commissions on equities, ETPs, and ETFs, when placed online in a self-directed brokerage account, range from \$0 to generally \$19.95; when placed with your financial advisor, commissions on equities, ETPs, and ETFs range from a minimum of \$65 to generally in the range of 2% to 3% of principal and rarely greater than 5% of principal. Commissions on options, when placed online in a self-directed brokerage account, are generally \$19.95 plus \$2 per contract, with a \$35 minimum; when placed with your financial advisor, commissions on options range from a minimum of \$40 to generally in the range of \$40-\$200 but may be greater based on principal and number of contracts. Such fees for equities, ETPs, ETFs, and options may be negotiable with your financial advisor based on services provided. Your financial advisor will receive these commissions subject to the payout grid described in Section V. A. You will also incur a \$6 order handling fee for each equity and options trade placed in your brokerage account; this fee is not passed through to your advisor.

When you purchase or sell fixed income securities or certificates of deposit in a brokerage account, you will pay a commission or sales credit. The commission or sales credit you are charged will vary depending on the maturity, call date, credit quality, type of bond, and whether the transaction is a purchase or sale. Commissions or sales credits on fixed income securities range from a minimum of \$25 to generally in the range of 0.20% to 2.75% of principal but no greater than 2.75% of principal and may be negotiable with your financial advisor based on services provided.

A list of other transaction-based fees charged directly against your account can be found by going to [Ameriprise.com/disclosures](https://www.ameriprise.com/disclosures) and accessing the Ameriprise Financial Schedule of Account and Service Fees listed under the Brokerage Client Agreement and Disclosures tab or by going directly to <https://www.ameriprise.com/cm/groups/public/@amp/@ameriprise/documents/document/p-044908.pdf>.

In addition, you may be charged an investment- specific commission when you purchase a mutual fund, REIT, structured product, brokered CD, annuity or other investment product. These products may also have fees embedded within the product and we may receive a portion of those fees. This direct and indirect compensation is described more fully below. If these products are purchased within an

advisory account, you will not pay any commission-based compensation but you will still incur any embedded fees and we will receive any indirect compensation described below.

## **C. Mutual funds**

The most common products purchased within a qualified plan account at Ameriprise Financial are open-end mutual funds. These mutual funds can be purchased on a no load basis through a brokerage account or as an Advisory Share (as defined below) or on a load- waived basis through an advisory account. Furthermore, mutual fund trades (other than money market funds) made through a brokerage account are subject to a \$6 order handling fee except for purchases made as part of a systematic purchase plan. These fees are not passed through to your advisor. For more information relating to the fees associated with a particular account type or mutual fund, contact your financial advisor or check our website at <https://www.ameriprise.com/research-market-insights/fund-screeners/>. In addition, any transaction fees or order handling fees we charge will be detailed in the confirmation provided to you after each transaction.

Mutual funds come in a variety of share classes with differing expense structures. In a brokerage account, mutual funds purchased within a qualified plan at Ameriprise Financial most commonly are load waived Class A shares. For Class A shares held in a brokerage account, you will pay 12b-1 fees as ongoing expenses. These 12b-1 fees are shared between Ameriprise and your financial advisor and passed through subject to the payout grid described in section V. A. below.

None of the mutual funds currently offered in Ameriprise advisory programs impose a front-end sales charge. For most mutual funds, a share class that does not have a sales-load and does not assess 12b-1 fees (collectively "Advisory Shares") is offered in all Ameriprise advisory programs as the only mutual fund share class, where available to us through a selling agreement. If not available to us through a selling agreement or if the mutual fund does not offer an Advisory Share class, we offer load waived Class A shares that may pay a 12b-1 fee or a no-load share class. Any 12b-1 fees received by Ameriprise Financial in an advisory account will be promptly rebated to your account.

Additional information related to services provided to plans in connection with mutual fund investments and how Ameriprise Financial and its affiliates receive compensation related to mutual funds purchased in your account can be found in the Investor's Guide to Purchasing Mutual Funds at Ameriprise Financial, located at [https://www.ameriprise.com/content/files/AMP\\_200757.PDF](https://www.ameriprise.com/content/files/AMP_200757.PDF). As described in the Investor's Guide, AEIS may receive indirect compensation in the form of marketing support, which may include an asset-based and/or sale-based payment, and payments for startup costs, conferences and client events. The amount of marketing support payments we receive varies by fund family and type of mutual fund (equity funds may pay more than bond funds). Full Participation fund families make payments to AEIS based on the amount of fund assets

Ameriprise Financial clients have bought and continue to hold, and can be up to 0.20% for asset-based payments.

Ameriprise Financial has cost-reimbursement arrangements with firms for distribution support services. These firms make cost-reimbursement payments to AEIS of up to 0.10% on assets for these services, which support the distribution of the fund's shares by making them available on one or more of Ameriprise Financial's platforms. These mutual fund firms do not provide marketing and sales support such as those provided by Full Participation firms to Ameriprise financial advisors. For mutual funds sold on a load-waived basis through our distribution agreement with Charles Schwab & Co. ("Schwab"), instead of receiving the marketing support fee described above, Schwab receives 12b-1 fees, marketing support and other payments from the mutual funds and passes through an asset-based fee of up to 0.40% to AEIS. In addition, AEIS may receive payments between \$20,000 to \$200,000 annually from Full Participation firms for Ameriprise Financial-sponsored advisor conferences which are typically educational in nature. The total dollar amounts received from each Full Participation fund family can be found at the end of the Investor's Guide and the Client Relationship Guide and on the Ameriprise Financial website. Marketing support is not passed through to your financial advisor.

In addition, AEIS receives payments from some mutual fund firms for client and other account services. These fees may also be referred to as "administrative fees", "sub transfer agency fees" or "networking fees". The fees paid to AEIS vary depending on the fund family and on whether the mutual fund keeps a separate record for each account ("networked accounts") or relies on our records (an "omnibus" account).

Compensation for networked accounts generally ranges from \$6 to \$12 per position annually. Compensation for omnibus accounts can be paid on a per position basis of between \$16 and \$19 annually or on an asset basis of between 0.10% and 0.15% annually. This compensation is not passed through to your advisor.

Please consult the prospectuses applicable to each fund in your account to determine whether any such fund (or one or more of its share classes) pays 12b-1 fees. Outside of shares held in advisory accounts, you should assume that we receive any such 12b-1 fees described in the prospectuses. To the extent the prospectus states that a 12b-1 fee is paid, such fund pays that amount to us and such amount is charged directly against the plan's investment in the fund and reflected in the net value of such investment. As described above, any 12b-1 fees received by Ameriprise Financial in an advisory account will be promptly rebated to your account. 12b-1 fees in brokerage accounts are generally passed through to your advisor subject to the payout grid described in Section V. A. below. For certain mutual fund share classes, the 12b-1 fees that are passed through to financial advisors are capped at 0.25%.

In connection with the services described above, Ameriprise Financial may receive compensation related to your mutual fund holdings either through payments from service providers to the mutual funds or indirectly through compensation received by affiliated entities such as Columbia Management Investment Advisers, LLC, (CMIA), Columbia Cent CLO Advisers, LLC, Columbia Wanger Asset Management, LLC ("Columbia Wanger Asset Management") and Threadneedle International Limited, which provide investment management services and administrative services to the Columbia Funds; Columbia Management Investment Distributors, Inc. ("Columbia Management Investment Distributors") which provides distribution services for the Columbia Funds, and Columbia Management Investment Services Corp. which provides transfer agency services to the Columbia Funds. CMIA and Columbia Wanger Asset Management also receives certain products and services (commonly referred to as soft dollar services) in connection with brokerage services provided to the Funds or accounts— see Section V. C. of this document for more information on soft dollar use and see the Client Relationship Guide and/ or the product offering documents for a description of the various revenues earned by our affiliates.

#### **D. New Issue Brokered CDs**

You may purchase new issue Certificates of Deposit ("CDs") within your brokerage account held at Ameriprise Financial. When you purchase a Certificate of Deposit, Ameriprise Financial receives an upfront commission of between 0.00% and 3.50% of the amount of the CD from the issuing bank, which is generally larger for CDs with longer terms. The commission is determined by the bank, not by Ameriprise based on the difference between what Ameriprise pays for the CD and the price of par to the client. For new issue CDs, you do not pay a sales credit or commission.

This payment is passed through to your financial advisor subject to the payout grid described in Section V. A. below. The banks issuing your CD guarantee you a rate of interest over the specified period of the CD and then invest the proceeds in hopes of earning a higher return. This is often referred to as "spread revenue" because the bank earns the difference between their investment earnings and the interest they pay to you.

#### **E. Certificates**

You can also purchase face-amount certificates issued by our affiliate, Ameriprise Certificate Company. Face-amount certificates are not insured by the FDIC. Ameriprise Certificate Company earns spread revenue when you purchase a face-amount certificate. In addition, Ameriprise Certificate Company pays Ameriprise Financial a distribution fee that ranges from 0.1% to 0.5% per year of term, except for Installment Certificates which pay a distribution fee of up to 0.5% of each payment to Ameriprise Financial. A substantial portion of the distribution fee paid to Ameriprise Financial may be passed through to your financial advisor subject to the payout grid described in Section V. A. below.

## F. Money Settlement Options

You should also review the money settlement option available for your account. A money settlement option is a feature offered by Ameriprise Financial that is primarily intended to hold cash: (i) pending investment into your account; (ii) to cover your account-level fees; (iii) to cover systematic cash withdrawals you have established for your account(s); (iv) for checking or debit card activity and to make bill payments ("Cash Management Activities"); and (v) for settling transactions in your account. Available money settlement options include either a free credit balance held in your account covered by Securities Investor Protection Corporation ("SIPC"), or a program that provides for the automatic movement or "sweep" of uninvested cash balances in your account into the money settlement program (each, a "Sweep Program").

A Sweep Program is not an investment strategy and is not intended as an investment option for you to maintain a significant cash balance for an extended period of time. Consider whether you have a short-term investment horizon, or whether you are holding cash for asset safety purposes (such as during periods of volatile or uncertain market conditions). In those cases, you should consider and discuss with your financial advisor other investment products offered within a brokerage account that may offer capital preservation with a higher rate of return for the cash component of your asset allocation. These investment products include *Ameriprise*® Certificates, brokered certificates of deposit, treasuries and positional money market mutual funds and are a more appropriate choice for investing cash than maintaining a significant cash balance in an account for an extended period. Your financial advisor can provide you with information about the cash management products available to you.

The banks participating in the Sweep Program earn income by lending or investing the deposits they receive and charging a higher interest rate to borrowers, or earning a higher yield, than the banks pay on the deposits held through the Sweep Program. This difference is known as the "spread."

Money settlement options available through Ameriprise Financial include both the Sweep Program we have assigned to your account and, for individuals who opt out of the Sweep Program, our free credit balance option. Sweep Programs are made available in accounts offered by Ameriprise Financial in its capacity as a broker-dealer, and services are provided by our affiliated clearing agent, AEIS, as part of the overall brokerage services provided to your account(s) pursuant to the "Money Settlement Options" section of the Ameriprise Brokerage Client Agreement. Your financial advisor does not recommend the Sweep Program offered to you for any particular account(s) and revenues received by our affiliates related to the Sweep Programs are not shared with financial advisors.

Accounts with *Ameriprise* Insured Money Market Account ("AIMMA") Sweep Program: If your account sweeps to AIMMA, our multi-bank sweep program, AEIS receives and retains compensation for its services related to AIMMA based on the cash deposits held at each program bank. As of June 10, 2020, the rates paid by unaffiliated program banks participating in AIMMA were within a range of 0.00%-1.00%, but, depending on movement of interest rates, this range could be higher. We will notify you if the range goes higher than 2.00%. Ameriprise Bank, FSB ("Ameriprise Bank") does not compensate AEIS for its sweep services provided or for the cash deposits held at Ameriprise Bank, but reimburses AEIS for its direct out of pocket expenses related to AIMMA. Like the unaffiliated banks participating in AIMMA, Ameriprise Bank earns spread revenue when it participates in AIMMA.

Accounts with Dreyfus Money Market Mutual Fund Sweep Program: If your account sweeps to a money market mutual fund, our affiliate AEIS may receive cost reimbursement payments of up to 0.42% of the amount held in that money market mutual fund program.

Accounts with a Free-Credit Balance as a money settlement option: If you have opted out of a cash sweep program and your uninvested cash is held in a free-credit balance with our affiliate AEIS, it may earn interest or other revenue on the balance, and may (but is not obligated to) pay interest on cash held as a credit balance in your account.

Accounts with Ameriprise Bank Insured Sweep Account ("ABISA") Sweep Program: ABISA is an FDIC insured, interest-bearing single bank deposit product made available by Ameriprise Financial. Ameriprise Bank serves as custodian for the cash balances held within accounts that are swept to ABISA, as described in the Other Important Brokerage Disclosures. Ameriprise Bank earns spread revenue for deposits in ABISA. Ameriprise Bank does not compensate AEIS for its sweep services provided or the cash deposits held at Ameriprise Bank, but does reimburse AEIS for its direct out of pocket expenses related to ABISA.

More details regarding Sweep Programs offered by Ameriprise Financial Services is available in the Other Important Brokerage Disclosures document and the "Money Settlement Options" section of the Ameriprise Brokerage Client Agreement available at [ameriprise.com/disclosures](http://ameriprise.com/disclosures).

## G. Non-traded REITs (Real Estate Investment Trusts) and other investments

Ameriprise Financial offers a range of investments in qualified retirement plans (i.e. 401(a) accounts) including non-traded Real Estate Investment Trusts (REITs), non-traded Business Development Companies ("BDC's"), non-traded Closed-end Funds, structured products, managed futures funds and hedge fund offerings. These products and the compensation we receive related to these products are described in more detail below. We also may receive payments between \$20,000 and \$120,000 annually from the sponsors of these products (excluding syndicates) for Ameriprise Financial-sponsored

advisor conferences which are typically educational in nature. We may also receive payments related to sales and training seminars for investors and advisors.

**Non-traded REITs and BDCs:** Ameriprise Financial offers non-traded REITs, through which investors pool capital to purchase assets such as a collection of real estate properties, real estate debt, and/or investments in land.

Ameriprise Financial and AEIS have agreements with the sponsors of non-traded REITs (“REIT Sponsors”), and provide certain services (such as distribution, marketing and customer support) related to each non-traded REIT, for which REIT Sponsors pay us a portion of the amount you invest to purchase shares. These payments and services are described in more detail below.

Ameriprise Financial offers non-traded BDCs, investment funds through which investors pool their capital to invest in debt of private companies to provide a combination of income distributions and potential long-term capital appreciation. This debt is often senior secured debt but may include subordinated debt, equity, or warrants to purchase equity at a specific price.

In connection with non-traded REITs and BDCs, Ameriprise Financial and AEIS may receive a fee of up to 7.5% of the amount invested, which is comprised of varying levels of selling commissions and/or cost reimbursement. For the specific fee maximum for each non-traded REIT or BDC, please see the applicable prospectus. Ameriprise financial advisors are paid a portion of that fee, subject to the payout grid described in Section V. A. of this guide. Cost reimbursements that Ameriprise (AEIS) may receive include due diligence expenses, client account maintenance, and technology costs associated with the offering.

Ameriprise Financial offers non-traded closed-end-funds, investment funds through which investors pool their capital to invest in debt or equity of private companies to provide a combination of income distributions and/or potential long-term capital appreciation. Funds may have very different investment objectives, time horizons, investment strategies and varying degrees of risk, return, and correlation to the broader equity and fixed income markets.

In connection with non-traded closed-end funds, Ameriprise Financial and AEIS may receive a fee of up to 7% of the amount invested, which is comprised of varying levels of selling commissions and cost reimbursement. For the specific fee maximum for each non-traded closed-end fund, please see the applicable prospectus. Ameriprise financial advisors are paid a portion of that fee, subject to the payout grid described in Section V.A. of this guide. Cost reimbursements that Ameriprise (AEIS) may receive include due diligence expenses, client account maintenance and technology costs associated with the offering.

**Structured products:** Structured products are bundled investments often designed to provide some principal protection with market exposure, though some only offer a partial protection against market performance or no protection at all.

Structured products can be in the form of structured CDs, principal protected structured notes and structured notes without principal protection, and are available in either transaction-based brokerage accounts or fee-based investment advisory accounts.

Ameriprise Financial receives cost reimbursement of between 0.25% and 0.60% (depending on the product type) multiplied by the number of years of the term of the product. For example, a structured note with a 3-year term could have an upfront cost reimbursement payment of 1.2% (3 x 0.40%). In addition, Ameriprise Financial receives selling commissions of up to 3% in conjunction with structured products. Commissions will vary based on complexity and tenor. Consult the offering document for more specific information related to a particular structured product. Such commissions are paid to your financial advisor subject to the payout grid described in Section V. A.

**Managed futures funds:** Ameriprise Financial offers managed futures funds, which are entities formed to invest assets directly or indirectly in the investment vehicles and trading strategies operated by Commodity Trading Advisors (“CTAs”). CTAs are professional money managers that use futures, forwards, options contracts and other derivatives instruments as investment vehicles, typically through automatic trading through computer-based models (so that individual positions are not actively managed).

AEIS has cost-reimbursement arrangements with firms for distribution support services in connection with managed futures funds. These firms may make ongoing cost reimbursement payments to AEIS of up to 0.25% (annual) on assets for these services.

**Hedge fund offerings:** Hedge fund offerings are investment products comprised of individual hedge fund strategies (“hedge funds”) or funds comprised of several hedge funds (“funds of hedge funds”).

Ameriprise Financial makes available various hedge fund offerings which may vary in terms of investment strategy, potential returns, volatility and risk, as well as in terms of whether the offering is registered or a private placement. These offerings can be individual hedge funds, as well as funds of hedge funds (i.e., funds made up of investments in several hedge funds.)

AEIS has cost-reimbursement arrangements with firms for distribution support services in connection with hedge fund offerings. These firms may make ongoing cost reimbursement payments to AEIS of up to 0.25% (annual) on assets for these services.

**Unit Investment Trusts (UIT):** A unit investment trust is a pooled investment vehicle in which a portfolio of stocks, bonds or other securities is selected by the sponsor and deposited into the trust. UITs can be purchased on a load basis through a brokerage account or on a load-waived basis through an advisory account. UIT trades made through a brokerage account are subject to a \$6 order handling fee. This fee is not passed through to your advisor.

AEIS receives compensation in various forms including dealer concessions, volume concessions and cost reimbursement payments from UIT sponsors whose products are distributed through Ameriprise Financial advisor channels. Dealer concessions can vary by trust and are paid on each sale in accordance with the UIT prospectus up to 3.00% of each sale. Consult the UIT's prospectus for fund-specific information. Dealer concessions are generally passed through to your advisor subject to the payout grid described in Section V.A. below.

As specified in the prospectus, all broker dealers receive volume concession based on a total sales formula which range from 0.035% to 0.175%. In addition, AEIS has cost reimbursement agreements in place with some UIT firms for the purpose of wholesaling and approved marketing material. These agreements produce annual payments between 0.058 to 0.084% on a flat fee based on projected UIT sales and an assumed growth rate over a 3-year life of the agreement.

#### **H. Annuities and life insurance**

Your advisor receives a commission when you purchase an annuity contract or life insurance policy or add additional funds to the contract. Detailed information related to your advisor's compensation can be found in the document titled "ERISA Disclosure for RiverSource Life Insurance Company Products" provided to you when you first purchased a RiverSource insurance product. For annuities issued by other insurance companies that are linked to your Ameriprise Financial brokerage account, detailed information related to your advisor's compensation can be found in the 84-24 notice obtained from the insurance company or by requesting this information from your advisor.

Below is a general summary of the costs and features of annuity and life insurance products. Note that Ameriprise Financial does not currently offer new life insurance policies to retirement plan clients. For each of the annuity and life insurance products listed below, please refer to the product contract for specific information related to the fees charged and to the prospectus or offering materials for the fees and other investment information related to the variable subaccounts, if applicable.

**Variable annuities:** Variable annuities offer lifetime income options, death benefit guarantees and optional living benefits. All guarantees are based on the continued claims-paying ability of the issuing company and do not apply to the performance of the variable subaccounts, which will vary with market conditions. Money you allocate to the variable

subaccounts will fluctuate in value, depending on the investment performance of the underlying funds.

You may pay a surrender (i.e., withdrawal) charge on a full or partial surrender of an annuity contract. Each purchase payment you make to a contract generally has a surrender charge that decreases over a specified period. Your contract may have a withdrawal provision that allows you to take out a portion of your money free of surrender charges.

Mortality, expense, administration and distribution fees may be charged daily against the unit values of the subaccounts and are intended to cover the mortality and expense risks that the insurance company assumes.

Contract administrative charges may be assessed annually or upon surrender against contracts with less than a stated value and are intended to cover costs associated with establishing and maintaining your contract.

Variable annuities provide optional features or benefits, called "riders," that are available for an extra charge. Fees for these riders are generally deducted from your contract value annually.

You indirectly pay the fees and expenses charged by the underlying mutual fund when you choose subaccounts that invest in underlying mutual funds. A description of the fees and expenses associated with the underlying funds can be found in the fund's prospectus. Furthermore, mutual funds that are part of the Columbia Funds pay fees to our affiliates as described in Subsection C above. Keep in mind that the funds available through a variable annuity product are not publicly traded retail mutual funds.

In addition, RiverSource Life Insurance Company and RiverSource Life Insurance Company of New York (collectively referred to as "RiverSource Life") may receive compensation from mutual fund assets, assets of the fund's subadvisor or an affiliate of either; and assets of the fund's distributor or an affiliate. This compensation currently ranges up to 0.65% on the average daily net assets invested in the fund through the variable annuity.

Furthermore, mutual funds that are part of the Columbia Funds pay fees to our affiliates as described in Subsection C above.

We may also receive payments for "marketing support" of up to 1.00% on sales and up to 0.15% on assets under management for annuity products issued by insurance companies other than RiverSource Life.

**Fixed annuities:** Fixed annuities are insurance products designed to meet long-term retirement and other long-range goals. In return for making one or more purchase payments, you earn a fixed rate of return, which is guaranteed by the insurance company. All guarantees are based on the continued claims-paying ability of the issuing company.

You may pay a surrender (i.e., withdrawal) charge on a full or partial surrender of an annuity contract. Each purchase

payment you make to a contract generally has a surrender charge that decreases over a specified period. Your contract may have a withdrawal provision that allows you to take out a portion of your money free of surrender charges.

**Registered index-linked annuities (also known as “structured annuities”):** Structured annuities are insurance products that are complex, long-term investment vehicles and are subject to risk, including the potential loss of principal. All guarantees are subject to the continued claims-paying ability of the issuing company. The rate of return for money a participant allocates to the indexed accounts of a structured annuity is linked to the performance of an underlying index; a participant does not invest directly in an index.

Participants may pay a surrender (i.e. withdrawal) charge on a full or partial surrender of a structured annuity contract. The contract may have a withdrawal provision that allows a participant to take out a portion of his or her money free of surrender charges.

The structured annuity currently available from RiverSource Life offers multiple indexed account options and a fixed account with no fees. Participants may also elect indexed account options with an annual fee. When money is allocated to an indexed account, a segment of a certain duration is created. Immediately after a segment begins, its value will be reduced to reflect transaction costs for assets that support the features of the structured annuity contract. The impact of these costs will generally decrease over the duration of the segment. If the segment is held to maturity, there are no transaction costs.

Additional details and information can be found in the product prospectus.

**Variable life insurance:** Variable life insurance is a form of permanent life insurance that provides life insurance protection on the life of the insured with flexible premiums, flexible face and death benefit amounts, and unbundling of the pricing factors (i.e., mortality, interest and expenses).

Variable life insurance has the potential to build value by investing a portion of your premiums in either a fixed account that earns interest or variable subaccounts that invest in underlying funds. Money you allocate to the variable subaccounts will fluctuate in value depending on the investment performance of the underlying funds.

In addition, RiverSource Life may receive compensation from mutual fund assets, assets of the fund’s subadvisor or an affiliate of either; and assets of the fund’s distributor or an affiliate. This compensation currently ranges up to 0.60% of the average daily net assets invested in the fund through the variable life insurance. Furthermore, mutual funds that are part of the Columbia Funds pay fees to our affiliates as described in Subsection C above.

A sales charge is deducted from each premium you pay. A surrender charge may be deducted from policy values if you

take a full surrender or if the policy lapses.

Mortality and expense risk fees charged from the policy value or daily against the unit values of the subaccounts are intended to cover the mortality and expense risk that the insurance company assumes. Cost of insurance is deducted monthly from the policy value to provide the death benefit.

Policy fees are deducted monthly from the policy value to cover expenses for underwriting, issuing and maintaining policy records. Life insurance policies provide optional coverage features called “riders” that are available for an extra charge. Rider fees are deducted monthly from the policy value. Surrenders, loans and withdrawals may cause a permanent reduction of policy cash values and death benefits, may negate any guarantee against lapse, and may cause the policy itself to lapse.

**Universal life insurance:** Universal life insurance is a form of permanent life insurance that provides life insurance protection on the life of the insured with flexible premiums, flexible face and death benefit amounts, and unbundling of the pricing factors (i.e., mortality, interest and expenses). A sales charge is deducted from each premium you pay. A surrender charge may be deducted from policy values if you take a full surrender or if the policy lapses.

Cost of insurance is deducted monthly from the policy value to provide the death benefit. Policy fees are deducted monthly from the policy value to cover expenses for underwriting, issuing and maintaining policy records.

Life insurance products often provide optional coverage features, called “riders,” that are attached to the policy and are available for an extra charge. Rider fees can be deducted from your policy value monthly.

Surrenders, loans and withdrawals may cause a permanent reduction of policy cash values and death benefits, may negate any guarantee against lapse, and may cause the policy itself to lapse.

**Traditional life insurance:** Traditional life insurance refers to whole and term life insurance policies that pay a specified sum to a beneficiary upon death of the insured and, in the case of term insurance, during a defined period.

The primary costs and expenses associated with a term life or whole life policy are included in the premium you pay.

Life insurance products often provide optional coverage features, called “riders,” that are attached to the policy and are available for an extra charge.

Surrenders, loans and withdrawals may cause a permanent reduction of policy cash values and death benefits, may negate any guarantee against lapse, and may cause the policy itself to lapse. Loans and withdrawals are generally not available in term life insurance policies.



## I. Other fees and Compensation

**Gifts and Entertainment:** Our employees, our affiliates' employees and financial advisors are subject to specific gifts and entertainment policies that prohibit them from receiving gifts that could influence their business judgment. Ameriprise Financial expects that such gifts and entertainment will be received in connection with our overall business relationship with such product wholesalers, and not specifically in connection with business conducted with one or more ERISA-covered plans. The guidelines on receipt of non-cash gifts prohibit such individuals from receiving gifts exceeding regulatory limits (currently \$100 per year) from any product sponsor. In addition, advisors are prohibited from receiving cash gifts of any amount from product sponsors. Advisors are prohibited from receiving entertainment in excess of \$2,500 per year from any product sponsor and no more than \$750 per event, including the value of any client-appreciation events. Advisors are not permitted to receive gifts or entertainment from any product sponsor if the gift or entertainment relates to ERISA-covered retirement plan clients. Employees of Ameriprise Financial and its affiliates are subject to the Ameriprise Financial Code of Conduct which prohibits employees from receiving gifts or entertainment that could influence the employee's business judgment. Some employees are subject to additional policies that further limit the receipt of gifts or entertainment.

**Cash Float:** AEIS may retain as compensation for services an account's proportionate share of any interest earned on aggregate cash balances held in its bank account with respect to (1) assets awaiting investment or (2) assets pending distribution from plan accounts. Such interest retained by AEIS is generally at short-term investment rates.

**Assets Awaiting Investment:** Assets awaiting investment or deposit include (1) amounts deposited into your plan accounts; and (2) any other uninvested assets held by your plan accounts caused by an authorized instruction to Ameriprise Financial to purchase or sell securities or other products (which may, after the period described below, automatically be swept into your plan's sweep account).

With respect to such assets awaiting investment or deposit

(i) where such assets are received by AEIS on a business day and before deposit cutoff time, AEIS will earn interest on such amounts through the beginning of the following business day; or (ii) where such assets are received on a day that is not a business day, or where such assets are received after deposit cutoff time, such interest may be earned through the beginning of the second following business day. A business day is defined as any day that the New York Stock Exchange and the Federal Reserve Bank of New York are open.

**Assets Pending Distribution:** On the same day that the processing is completed, the amount of the distribution will be debited from the plan account. The distribution check will generally be written and mailed on the same business day.

AEIS will earn interest beginning on the date the account is debited and ending on the date the check is presented for payment, the timing of which is beyond AEIS's control. Upon request, AEIS will provide a verbal update to determine the status of the outstanding distribution checks.

If an in-kind transfer is requested to another firm, AEIS will liquidate any amount held in your plan's cash sweep- account and AEIS may earn interest from the period of liquidation until the transfer is completed, typically within a few business days after the date of liquidation.

If an account's cash sweep account changes, the cash held in the account may be uninvested for a short time generally one business day during which time AEIS may earn interest.

**Trade Error Compensation:** When it is brought to our attention that a trade error falls within the scope of our services to the plan, Ameriprise Financial will correct the error as soon as possible after the error has been identified, with the goal of putting the plan account into the same position that would have resulted if the error had not occurred. If the error is the result of our breach of responsibilities to the plan, we will make the plan account "whole" for any losses that may have resulted from the error.

Nevertheless, under some circumstances, our correction of an error could result in a gain. If there is such a gain, AEIS will retain the amount of the gain, which may constitute part of its compensation for services rendered to the plan.

Generally, if related trade errors result in both gains and losses, they may be netted. AEIS will correct advisor trade errors, consistent with the advisor's instructions and this policy. In general, the net gain or loss amount is calculated based on the difference in cost between the original incorrect trade(s) and the cost of the corrective transaction(s) needed to place the account in the position it would have been had there been no error.

## III. Compensation for termination of contract or arrangement

Your account with AFS may be terminated at any time, subject to one or more of the following fees. Certain products you select may charge a fee or penalty for early withdrawals or may not be readily liquidated. These product-specific limitations are described above and in the offering documents for each product.

## IV. Recordkeeping services and investment disclosures

Ameriprise Financial provides monthly or quarterly statements of account holdings to plan sponsors. In cases where the plan sponsor has set up separate accounts for each plan participant, we provide to plan sponsors participant-level statements detailing each participant's account holdings at Ameriprise Financial. We do not keep records of beneficiary information, prepare Form 5500s or provide other services common for service providers that hold themselves out as "recordkeepers." Although our services are not intended to be recordkeeping

services, they could be characterized as such under the Regulation. For custodial 401(a) accounts, we typically charge a \$75 annual custodial fee per plan participant. For investment only accounts, we may charge a \$25 quarterly maintenance fee for each brokerage account.

For participant-directed accounts, participants have access to all of the products and services described above, with the related compensation that will be charged directly against any such product as described above. The expected total annual operating expenses of such products may be found in the contract for the product or in the product's prospectus or offering document, as applicable. If you permit participants to direct investments, you must provide your participants with disclosures under the Department of Labor's participant fee disclosure regulations (also referred to as "404(a)(5) regulations"). We can provide you with a sample document that you can use as a starting point to design a disclosure document for your participants. We do not generally provide services designed to accommodate designated investment alternatives. However, if one of the securities you have purchased is a designated investment alternative, please notify us and we will provide you with any information within our control, or reasonably available to us, that you might require in order to comply with your own disclosure obligations to participants. You are also responsible for delivering a lifetime income illustration, at least annually, to your participants. It is your responsibility to ensure that your participants receive all of the information required under ERISA.

## **V. Related party compensation**

### **A. Amounts paid to your advisor:**

Our financial advisors are compensated differently depending on their affiliation with our firm.

- More than half of our financial advisors are independent contractor franchisees — they are not employed by Ameriprise Financial and they do not receive a salary from us. They are licensed registered representatives of Ameriprise Financial.
- Many of our financial advisors are employee financial advisors who are employed by and are registered representatives of Ameriprise Financial.
- We also have associate financial advisors. These financial advisors are employed by or contract with the independent contractor franchisees and are licensed registered representatives of Ameriprise Financial.
- Additionally, some of our financial advisors may be under different compensation programs than others, depending on, among other factors, the advisor's industry experience and tenure with Ameriprise Financial and whether they work in the Ameriprise Advisor Center.

**Salary.** Employee financial advisors and associate financial advisors receive a salary or flat fee, in addition to the fees described below, from Ameriprise Financial or the independent contractor franchisee advisor, respectively. Financial advisors may also have the potential to receive bonus compensation.

**Commissions and advisory service fees.** A portion of advisory service fees is paid to your financial advisor. The remaining portion of the fees goes to AFS for the supervisory, technical, administrative and other support that is provided to all financial advisors. Additionally, sales charges you pay on the products and services you purchase are paid to your financial advisor in the form of commissions. The amount paid to your financial advisor depends on the payout rate your financial advisor qualifies for and the amount of fees you pay. Other fees AEIS receives, like marketing support payments and networking fees are not shared with our advisors.

- 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 AFS receives. The payout percentage varies depending on how much advisory service fees and product commissions the advisor generates each year and (for franchisee advisors only) the size of the advisor's book of business. In addition, the financial advisor may qualify for a bonus which could increase the effective advisor payout rate up to 96% for independent contractor franchisees and 57% for employee financial advisors, respectively.
- Financial institution financial advisors generally receive 0% to 91% of the advisory service fees and product commissions based on the 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 advisory service fees and product commissions but may receive compensation in the form of a bonus based in part of the revenue generated from such fees.
- In general, commission and referral fees generated by an associate financial advisor are paid to the employing or contracting financial advisor. At the discretion of the employing or contracting financial advisor, the associate financial advisor may receive referral fees or a bonus.
- For additional information related to how our advisors are paid, please refer to the Client Relationship Guide available at [Ameriprise.com/disclosures](http://Ameriprise.com/disclosures).

### **B. Transaction based payments**

Section II above describes all of the fees you pay for investment transactions at Ameriprise Financial. This section describes transaction-based fees we pay to our affiliated clearing broker-dealer and also transaction-based fees we

charge to our franchisee financial advisors when you execute a trade. None of the fees described below are paid by you.

When you pay a commission on a securities transaction in your brokerage account, Ameriprise Financial uses a portion of the commission to pay its affiliated clearing broker-dealer, AEIS for the transaction. For equity trades (e.g., stocks), fixed income trades (e.g., bonds), option trades, and mutual fund trades AEIS charges up to \$10 per trade. The exact amount Ameriprise Financial pays for trades depends on the volume of all Ameriprise Financial client trades each month. For REITs, managed futures, structured products, syndicates and similar products, AEIS charges us a fee of between \$20 and \$25 per trade. AEIS does not charge us a transaction-based fee for transactions in advisory accounts.

For brokerage accounts, we may also charge franchisee advisors a ticket charge when you make a trade. Employee advisors do not pay ticket charges but the market group they are associated with does pay ticket charges. Ticket charges for mutual funds can be up to \$35 for trades depending on whether the trade was requested online or over the phone, whether the transaction was part of a systematic plan, and whether the transaction is an exchange.

For brokerage accounts, ticket charges to franchisee advisors for other types of securities can be up to \$75 depending on the type of security involved, whether the trade was entered online or over the phone and for online trades, whether the transaction was initiated by you or your advisor. In addition, we charge franchisee advisors a \$.02 per share transaction fee for most equity trades.

For Advisory accounts, ticket charges for mutual funds can be up to \$30 for trades if the trade was requested over the phone.

AEIS may receive compensation from various broker/dealers or market centers for directing its trade volume to those institutions for execution. This form of compensation is often referred to as "Payment for Order Flow" and is generally made in the form of monetary payments which vary depending on the type of security. Option contracts usually generate the highest payments generally ranging from \$.50 to \$1 per option contract. AEIS payment for order flow and order routing policies are furnished to customers at account opening and on an annual basis. For more detailed information, please visit our Order Routing Report published quarterly on [ameriprise.com](http://ameriprise.com).

This can be accessed by following the path: [ameriprise.com](http://ameriprise.com) > Click "Products and Services" > Click "Investments"> Click "Stocks and ETPs" > Under "Related information" in the lower right corner click "Section 606 Order Routing Report".

### C. Compensation paid to our other affiliates

When you purchase products created or maintained by one of our affiliates, those affiliates may earn investment spread revenue, management fees or other service fees. See the Client Relationship Guide and/or the product offering documents for a description of the various revenues earned by our affiliates.

**Soft Dollars:** CMIA, Columbia Wanger Asset Management and third party subadvisers may receive proprietary and/or third party research services from broker-dealers through which they execute transactions on behalf of client accounts held in the Columbia Funds or in separately managed accounts. Section 28(e) of the Securities Exchange Act of 1934, along with related SEC interpretations, provides a "safe harbor" from certain federal and state laws enacted prior to June 4, 1975 (including ERISA) for investment advisers to obtain research used in investment decision making and brokerage services with client commissions. CMIA and Columbia Wanger Asset Management have adopted policies and procedures designed to ensure that the use of client commissions falls within the safe harbor and other applicable regulatory requirements, while permitting client accounts to benefit from our investment professionals' use of other firms' research and related investment decision making tools. The value of these proprietary and third party research services may be considered indirect compensation to CMIA and Columbia Wanger Asset Management. A more complete description of CMIA and Columbia Wanger Asset Management client commission practices is available in each of their respective Forms ADV Part 2A, available online through the Investment Adviser Public Disclosure website at [adviserinfo.sec.gov](http://adviserinfo.sec.gov).

In addition, it should be noted that some broker-dealers with whom CMIA's fixed income department executes trades provide the fixed income department with proprietary research products and services, though the fixed income department does not put in place any client commission arrangements with such broker-dealers. It is CMIA's policy not to execute a fixed-income trade with a broker-dealer at a lower bid/higher offer than that provided by another broker-dealer in consideration of the value of research products and services received by the fixed income department. CMIA may also receive proprietary research products and services from derivatives counterparties with which they have not established a client commission arrangement, similar to the approach taken with fixed-income broker-dealers described above. In these situations, CMIA may take the research into account in determining whether to add the derivatives counterparty to its approved list, but CMIA does not consider the value of the research products and services provided on a trade-by-trade basis. For Columbia Funds utilizing one or more sub-advisers, the sub-advisers may receive proprietary and/or third party research pursuant to similar arrangements.

It is possible that CMIA or an investment subadviser subject to the recent revisions to the EU's Markets in Financial Instruments Directive will cause a fund to pay for research services with soft dollars in circumstances where it may not use

soft dollars with respect to other advised/managed funds or accounts, although those other advised/managed funds or accounts might nonetheless benefit from those research services

For more information regarding these payments, please refer to the fund's SAI.

#### **D. Referral fees**

Some of our financial advisors participate in alliance programs with accountants and other professionals. In those circumstances, you will receive a disclosure form from your financial advisor notifying you of the referral fee arrangement. Financial advisors may pay referral fees on a fixed dollar basis generally between \$200 to \$500 per referral or as a percentage of your financial advisor's commissions, generally less than 30%.

Some of our financial advisors may participate in an alliance with one or more financial institutions. The financial advisor may pay rent to the financial institution to use office space at a particular branch office or share a percentage of commissions generally less than 30%.

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 nondeposit investment and insurance products and services to retail customers/ members of the Third Party Financial Institutions. As a result of these alliances or networking arrangements, financial advisors may not be able to offer to retail customers/members of the Third Party Financial Institutions certain products available through Ameriprise Financial 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 the asset-based fees and securities and insurance commissions paid to financial advisors for sales to retail customers/members of the Third Party Financial Institutions.

#### **VI. Fiduciary status**

Pursuant to the Regulation, we are required to let you know if we will provide, or reasonably expect to provide, services to your plan in an ERISA fiduciary capacity or as an investment adviser registered under the Investment Advisers Act of 1940 (the "Advisers Act") or any State law.

Neither Ameriprise Financial nor your financial advisor is acting as a fiduciary for the following: when we provide you recommendations related to your brokerage account or with respect to commission-based products we offer and you understand that any advice you receive is not intended to serve as the primary basis for your investment decisions. We are not acting as a fiduciary when you decide to hire us a service provider to your retirement plan, or the decision of a plan participant to roll over assets to an Ameriprise IRA. We are not acting as a fiduciary under ERISA or the Internal Revenue Code when you decide to move assets from one type of account held at Ameriprise Financial to another type of account but may be acting as a fiduciary under the Advisers Act with respect to your decision transfer assets into and out of an advisory account.

We expect to provide services to Advisory Accounts as a sponsor of the wrap fee program and an investment adviser registered under the Advisers Act. In addition, both Ameriprise Financial and our affiliate, CMIA act as an investment adviser registered under the Advisers Act and as an ERISA fiduciary when providing discretionary asset management services with respect to our Active Portfolios program. CMIA also acts as an ERISA fiduciary and a fiduciary under the Advisers Act with respect to Select Separate Account strategies it manages.

For the fiduciary status under specific Advisory Account products, see the chart in Appendix A below.

Each state has its own laws governing they type of activities that result in fiduciary status. To the extent such laws are not preempted by ERISA, our services provided to your retirement plan could result in us being a fiduciary under such state law. .

## Appendix A: Fiduciary Chart for Advisory Programs

	SPS Advantage	Active Portfolios Investments	Select Separate Account	Vista Separate Account	Investor Unified Account	Access Account
Ameriprise financial advisor	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2
Ameriprise Financial as program sponsor	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2	'40 Act ERISA-2
Ameriprise Financial as investment manager*	NA	NA	'40 Act ERISA-2	NA	NA	NA
Third-party investment manager	NA	'40 Act ERISA-1	'40 Act ERISA-1	'40 Act ERISA-1	'40 Act ERISA-1	'40 Act ERISA-1
Columbia Management as investment manager**	NA	'40 Act ERISA-1	NA	NA	NA	NA
Mutual Fund Manager***	No	No	No	No	No	No
AEIS as custodian and/ or clearing broker- dealer	No	No	No	No	No	No
Ameriprise Trust Company as custodian	No	No	No	No	No	No

- "40 Act" means the service provider is providing services as a fiduciary to the plan under the Investment Advisers Act of 1940.
- "ERISA-1" means the service provider is providing services as a fiduciary to the plan under the Employee Retirement Income Security Act of 1974, as amended.
- "ERISA-2" means that to the extent that Ameriprise Financial or your financial advisor makes a recommendation, both parties will be providing services as a fiduciary to the plan or participant under ERISA.
- "NA" means the entity is not provided services for the program.
- "No" means the entity is providing services on a non-fiduciary basis to the plan.

\*The Managed Accounts Program Oversight Committee of Ameriprise Financial Services is the investment manager of Select ETF Portfolios. For Select Separate Accounts, Ameriprise Financial Services exercises investment discretion for accounts utilizing Model Providers and implements securities transactions in accordance with the model portfolio provided by the Model Provider. A Model Provider constructs a model portfolio according to their specific investment strategy and, in that capacity, make investment selection decisions for the model portfolio strategy, which Ameriprise Financial Services implements, subject to any reasonable restrictions or other instructions provided by you.

\*\* Columbia Management is the investment manager for *Active Accumulation Portfolios*<sup>®</sup> (available only for non-qualified accounts) and Active Risk Allocation Portfolios.

\*\*\* Mutual fund managers, including CMIA with respect to the Columbia Funds, are '40 Act fiduciaries to the mutual fund company only.

Please review the *Ameriprise* Managed Accounts Client Disclosure Brochure for a full description of services offered, including fees and expenses.

Investment products offered through Columbia Management Investment Distributors, Inc., member FINRA. Advisory services provided by Columbia Management Investment Advisers, LLC. Columbia Management is affiliated with Ameriprise Financial.

Issued by RiverSource Life Insurance Company, Minneapolis, Minnesota, and in New York only, by RiverSource Life Insurance Co. of New York, Albany, New York. Affiliated with Ameriprise Financial Services, LLC.

Investment advisory products and services are made available through Ameriprise Financial Services, LLC, a registered investment adviser. Ameriprise Financial Services, LLC. Member FINRA and SIPC.