

Information around investment manager step-out trades

What does this mean to an investor?

2019 & 2020 summary

What is a step-out trade?

Step-out trading occurs when a third-party investment manager decides to execute a trade with a broker-dealer other than Ameriprise.

Certain separately managed account (SMA) investment managers place certain client trade orders with broker-dealers or exchanges other than American Enterprise Investment Services (AEIS), the clearing dealer for Ameriprise Financial Services, LLC (AFS). These trades are known as “step-out trades.” Step-out trades help the investment manager meet its obligation to seek best execution for trades. SMA investment managers provide additional details regarding their trading practices and what, if any, additional costs clients incurred as a result of placing step-out trades.

Why would a third-party manager perform a step-out trade?

The investment manager is attempting to fulfill its best execution obligation and believes going to a broker-dealer other than Ameriprise will improve overall execution quality. In some instances, step-out trades are executed without any additional transaction costs from the third-party broker-dealer. In other instances, the investment manager chooses to perform a step-out trade even if the client will incur additional transaction costs because the manager believes it will improve overall execution quality. Placing these trades with other broker-dealers may or may not impact the investment performance of the client’s account.

What does best execution obligation mean?

Best execution means that an investment manager must place client trade orders with broker-dealers that the manager believes can provide the best execution possible for their clients' orders. When seeking best execution, an investment manager must consider several factors, including opportunity to get a better trade price than what is currently quoted, and how quickly can the trade be executed.

How can a step-out affect a client?

When a step-out trade occurs, any additional cost charged by the third party is passed to an investor and is included in the price they pay for the security. This price is in addition to what an investor pays for their wrap fee.

The following charts provide a list of the equity investment managers that informed Ameriprise that they engaged in step-out trades since 2019. Listed by product and strategy, the chart shows any additional transaction costs over the time period listed. Several variables can impact these percentages, including the number of accounts in a strategy, the timing of inception and terminations of accounts, client-directed cash flows and the time period under review. All these variables affect the percentage and dollar amount of trades that were stepped out. Existing clients can obtain information regarding their actual costs for step-out trades on client statements and trade confirmations, which are listed as Third-Party Execution Fees, or by contacting their financial advisor. Information regarding each investment manager's best execution, trade aggregation and trade allocation practices, if any, as well as whether the investment manager may select broker-dealers that provide the investment manager credit toward the acquisition of research or other transaction related products and services are generally discussed in the investment manager's Form ADV Part 2A disclosure brochure.

**SELECT SEPARATE ACCOUNT STEP-OUT TRADE INFORMATION
FOR 2019 & 2020**

		Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades ¹	Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades ¹
Manager Name	Strategy Name	2019		2020	
Invesco	Invesco International ADR Growth	58.40%	0 cps	–	–
	Invesco U.S. Real Estate Securities	53.22%	0 cps	–	–
Kayne Anderson Rudnick	Small Cap Quality Value	26.40%	2.04 cps	43.82%	2.14 cps
	Small Cap Sustainable Growth	39.27%	1.54 cps	46.62%	2.18 cps
Laffer Investments	Convertible	100%	0 cps	96.2%	0 cps
Legg Mason	Dividend Strategy Balanced	0.99%	1.62cps	1.54%	1.49 cps
	Large Cap Growth Balanced	–	–	0.90%	1.25 cps
Mackay Shields	Convertible Securities	80.23%	0 cps	–	–
MFS	Large Cap Value	9%	0 cps	–	–
	Research International ADR	50%	1.30 cps	8%	1.22 cps
Nuveen	Preferred Securities	31%	0 cps	16.73%	0 cps
Oak Ridge	Oak Ridge All Cap Growth	1.14%	5.00 cps	–	–
Principal Global Investors	Spectrum Hybrid Preferred	90-99%	0 cps	85-95%	0 cps

¹ Additional cost is expressed in terms of an average or range of cents per share (“cps”)

**VISTA SEPARATE ACCOUNT STEP-OUT TRADE INFORMATION
FOR 2019 & 2020**

		Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades ¹	Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades ¹
Manager Name	Strategy Name	2019		2020	
Brandes	International Equity Portfolio	–	–	0.10%	5 cps
Caprin	Intermediate Muni National	100%	0.005 cps	–	–
Legg Mason	All Cap Blend Portfolios (MDA0)	29.09%	1.33 cps	20.23%	1.27 cps
	Dividend and Growth Portfolios (MDA3)	34.36%	1.33 cps	54.77%	1.61 cps
	Global Multi Cap Growth Portfolios (MDA4)	40.80%	1.23 cps	53.20%	1.26 cps
	Diversified All Cap Portfolios (MDA5A)	58.44%	1.27 cps	25.52%	1.25 cps
	Global Growth Portfolios (MDA7)	87.98%	1.10 cps	100%	1.30 cps
	Global All Cap Portfolios (MDA7A)	50.52%	1.21 cps	71.61%	1.25 cps
	Balanced Income Managed Account	23.44%	1.06 cps	53.56%	0.38 cps
	Dividend Strategy Portfolios Balanced Tax Favored (60/40)	26.23%	1.63 cps	40.12%	1.57 cps
	Dividend Strategy Balanced Taxable 60/40	85.56%	1.59 cps	–	–
Wellesley	Wellesley Convertibles Managed Account	100%	0 cps	100%	0 cps

¹ Additional cost is expressed in terms of an average or range of cents per share (“cps”)

Contact your Ameriprise financial advisor if you have questions around step-out trades and how they may impact your accounts.

Clients should review the *Ameriprise*® Managed Accounts Client Disclosure Brochure, or if they have elected to pay a consolidated advisory fee, the *Ameriprise* Managed Accounts and Financial Planning Service Disclosure Brochure, for a full description of services offered, including fees and expenses as well as any applicable updates.

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