

## Information around investment manager step-out trades

### What does this mean to an investor?

#### 2021 & 2022 Summary

#### **What is a step-out trade?**

Step-out trading occurs when an investment manager for your managed account 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 that executes trades on behalf of 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 broker-dealer selected. 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 the asset-based fee the client pays for their managed account.

The following charts provide a list of the equity investment managers that informed Ameriprise that they engaged in step-out trades since Q1-Q4 2022. 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 inceptions 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.

It is important to note that certain investment managers that specialize in fixed income strategies may engage in step out trading, but additional costs of executing a fixed income trade, also called the mark-up or mark-down, is reflected in the net price of the security and are not reflected as a separate charge on trade confirmations of the investment managers.

**SELECT SEPARATE ACCOUNT STEP-OUT TRADE INFORMATION  
FOR 2021 & 2022**

		Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades <sup>1</sup>	Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades <sup>1</sup>
<b>Manager Name</b>	<b>Strategy Name</b>	<b>2021</b>		<b>2022</b>	
Kayne Anderson Rudnick	Small Cap Quality Value	23.33%	2.6 cps	40.53%	1.02 cps
	Small Cap Sustainable Growth	17.47%	1.5 cps	32.93%	1.6 cps
Laffer Investments	Convertible	100.0%	0 cps	-	-
Legg Mason	Dividend Strategy Balanced	1.66%	1.53 cps	0.51%	1.52 cps
	Large Cap Growth Balanced	1.72%	1.16 cps	1.55%	1.03 cps
MFS	Research International ADR	2.6%	1.5 cps	-	-
Nuveen	Preferred Securities	12.3%	0 cps	9.3%	0 cps
Principal Global Investors	Spectrum Hybrid Preferred	90-99%	0 cps	90-95%	0 cps

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

**VISTA SEPARATE ACCOUNT STEP-OUT TRADE INFORMATION  
FOR 2021 & 2022**

		Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades <sup>1</sup>	Percentage of Client Trades Stepped Out	Additional Cost Incurred by Client Participating in those Trades <sup>1</sup>
<b>Manager Name</b>	<b>Strategy Name</b>	<b>2021</b>		<b>2022</b>	
Caprin	Intermediate Muni National	-	-	100%	0.0 cps – 0.01 cps
Legg Mason	All Cap Blend Portfolios (MDA0)	34.26%	1.36 cps	36.47%	1.21 cps
	Dividend and Growth Portfolios (MDA3)	67.96%	1.61 cps	61.19%	1.57 cps
	Global Multi Cap Growth Portfolios (MDA4)	43.80%	1.41 cps	21.55%	1.37 cps
	Diversified All Cap Portfolios (MDA5A)	78.13%	1.36 cps	32.72%	1.22 cps
	Global Growth Portfolios (MDA7)	65.59%	1.38 cps	-	-
	Global All Cap Portfolios (MDA7A)	86.92%	1.39 cps	87.35%	1.28 cps
	Balanced Income Managed Account	43.18%	0.43 cps	6.55%	0.32 cps
	Dividend Strategy Portfolios Balanced Tax Favored (60/40)	12.53%	1.59 cps	17.84%	1.58 cps

<sup>1</sup> 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.

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