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## OTHER IMPORTANT BROKERAGE DISCLOSURES

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This document contains important disclosures which may be applicable to your account and/or related to specific features of your account that you may have selected. As used in this document, the words "you", "your" and "yours" refer to the applicant and is the person or entity to whom we address account statements, as well as any person or entity who agrees to be liable on the account. "We", "our" and "us" mean Ameriprise Financial Services, LLC ("Introducing Broker" or "Ameriprise Financial") and/or American Enterprise Investment Services, Inc. ("Clearing Broker" or "AEIS"). As used in this document, the singular shall mean the plural where appropriate. This document, and the "Ameriprise Brokerage Client Agreement" which is incorporated herein by this reference, along with any account or product application you complete, form the contract governing our relationship. Also, attached to "Other Important Brokerage Disclosures," is an Appendix referred to as "Regulation Best Interest Disclosure." Please also carefully read this Appendix. This Regulation Best Interest Disclosure contains information about the scope of our relationship with you, the types of products and services we offer and the costs and fees associated with them, as well as conflicts of interest associated with recommendations we make to you. The Appendix is informational, does not contain any Terms and Conditions, is not a part of the Ameriprise Brokerage Client Agreement and is not incorporated by reference. For purposes of this document, "securities and other property" shall include, but not be limited to, money, securities, and financial instruments of every kind and nature, and all contracts and options relating thereto, whether for present or future delivery. This document includes information on the following topics:

- The Enterprise Resiliency Program
- Money Settlement Options
- Money Settlement Option Disclosures
- Ameriprise ® Insured Money Market Account (AIMMA)
- Ameriprise ® Bank Insured Sweep Account (ABISA)
- Information about Bank Sweep Programs
- Information about FDIC and SIPC
- IS Service/Sweep Contingency Plans and Procedures
- AIMMA Deposit Capacity - Contingency Procedures
- Payment for Order Flow
- Electronic Fund Transfer
- Information Relating to Payments Made to Ameriprise for Deposit
- Addendum A - Summaries of 2024 mutual fund firms cost reimbursement payments
- Appendix - Regulation Best Interest

Note that the products and services described in this document may not be available in all Ameriprise accounts or for all ownership types.

**Amendments.** We may modify or change the provisions of this document and the information included in related disclosures. For material changes, we will notify you of such changes, as applicable by mailing a written notice of the modification or change or a new printed document to you at your address as reflected on the application or other postal or electronic address you provide to us or, if you have agreed to use the electronic services provided by us, by posting such modifications or changes online. Such written notice or posting of the amendment will include the effective date of the modification or change. No such amendment shall become effective prior to 30 days from the date of such notice unless required or otherwise permitted by law or regulation. You agree that you will promptly read all such notices that we provide to you. Non-material changes may be made without advanced written notice to you. You may always access the current versions of this document at [ameriprise.com/disclosures](http://ameriprise.com/disclosures) or by contacting your financial advisor. Your use of the account after the effective date of such amendments shall constitute your acknowledgement and agreement to be bound thereby.

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### The Enterprise Resiliency Program (includes Event Response, Business Continuity, Disaster Recovery)

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Ameriprise Financial is committed to providing exceptional service to clients without interruption. Maintaining an effective Enterprise Resiliency program is essential to achieve that goal. We are committed to protecting our clients' and the company's information and assets without disruption. We invest in significant resources, including dedicated staff, systems, and processes, to create and maintain plans and recovery strategies within our business and services. Our firm-wide Enterprise Resiliency framework, supported by senior management, provides an integrated approach in addressing the needs of our business and operations; our staff, facilities, technology, and data - incorporating continuity into the way we work

#### Event Management and Response

Ameriprise has robust processes in place to respond thoughtfully and strategically to crisis events, while maintaining continuity of operations. The Event Response Team (ERT) comprised of leaders and subject matter experts, is available 24/7 to facilitate a well-coordinated response to events which may cause disruptions - these may include sudden and unexpected events, such as severe weather or a global pandemic - and proactively works with the business and technology to mitigate impacts. Ongoing training and education are provided to help prepare the firm for possible business disruptions, as well as validate a response for a variety of possible incidents with key personnel.

#### Business Continuity

We create, document, and maintain business continuity plans (BCPs) based upon a proactive "all hazards" approach in preparing for disruptions of varying severity and scope, from a destructive severe weather event to a technology or power outage, our plans and strategies address the potential for both short-term and long-term disruptions.

BCPs are reviewed and updated annually at a minimum or in the event of a material change through a series of plan enhancement workshops facilitated by a business continuity subject matter expert with participation from the business area and management. As part of the planning process, a business impact analysis is performed to assess each business process and to determine criticality and define recovery time objectives, ensuring efficient recovery planning for potential disruptions. To ensure readiness, we regularly conduct exercises that validate our plans and recovery strategies. Plans are approved and certified annually by business leadership.

Ameriprise maintains multiple recovery solution strategies that enable us to activate the appropriate strategy based upon the severity and duration of the event or business disruption. Key components include alternate workplace recovery facilities, remote access workplace strategies and geodispersed operations. Our flexible, multi-faceted approach allows us to respond appropriately and effectively based on the type of event.

### **Disaster Recovery**

We maintain established policies, standards and operational measures designed to back-up and protect our data. Disaster Recovery Plans (DRPs) are designed and tested by our technology teams to address the specific needs and risks of technology systems and applications. DRPs are updated to reflect changes and the most current information and are approved annually as part of our formal plan certification. Regular exercises and testing are conducted to validate the plans are effective, and that critical applications and recovery procedures are in place. Dedicated technology teams ensure that critical applications and data have appropriate redundancy and are replicated offsite. Testing and validation of backup frequency is based upon the critical nature of the data. Our recovery approach is designed to guard against the loss of critical data.

We recognize that despite the measures we have taken and may take in the future to address and mitigate technology risks, natural or man-made disasters and other events, we cannot be certain that we will not experience outages, interruptions or interference that may impact our processes or operations. Similar to other firms in the industry, we may be impacted by events that are beyond our control. We believe we have reasonable, intentional processes and utilize best practices to allow us to manage the associated risks and resume operations.

### **Conclusion**

The Enterprise Resiliency program will continue to evolve to meet the needs of our clients, employees, and other stakeholders. Should there be a significant business disruption, contact your advisor or our service center at 800.862.7919 or visit ameriprise.com for additional information.

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## **Money Settlement Options**

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Your account may accumulate cash over time, from regular or occasional deposits you may make or from interest earned or dividends paid on investments you own. Your money settlement option is not intended to be a long-term investment for cash holdings but does provide liquidity for future transactions within your account. The benefits of maintaining cash in your money settlement option include:

- Same-day access to cash to pay for purchase transactions so you're certain your account is funded before your transaction settlement date, eliminating issues with lack of "good funds" at settlement
- SIPC protection for free credit balances, up to \$250,000 per account
- FDIC protection for Ameriprise Insured Money Market Account ("AIMMA") balances held in bank deposit accounts, up to \$2.5 million (\$5 million for joint accounts) as outlined below
- FDIC protection for Ameriprise Bank Insured Sweep Account ("ABISA") balances held in deposit accounts at Ameriprise Bank, FSB, up to \$250,000
- In the Ameriprise ONE® Financial accounts, access to your cash via check-writing, debit card and online bill payment.
- For qualified accounts, the ability to preserve the tax-qualified nature of cash held in the account, versus having to transfer cash from a qualified bank account to pay for securities purchases or account fees, or to a qualified bank account to obtain FDIC coverage.

### **Bank Sweep Programs**

AEIS offers both the Ameriprise Insured Money Market Account ("AIMMA") and the Ameriprise Bank Insured Sweep Account ("ABISA") as money settlement options that sweep uninvested cash daily to interest bearing FDIC insured deposit accounts ("Deposit Accounts") established at one or more banks or other depository institutions, including our affiliate, Ameriprise Bank, FSB ("Bank Sweep Programs"). Deposits held at banks participating in Bank Sweep Programs offer pass-through FDIC insurance up to a specific amount per depositor in each ownership category if certain conditions are met. The Bank Sweep Programs and FDIC coverage are further described in the "Ameriprise® Insured Money Market Account", "Ameriprise® Bank Insured Sweep Account", and "Information about FDIC and SIPC" sections of this document.

### **Money Market Mutual Fund Sweep Program**

For certain ownerships and in certain circumstances, AEIS makes a money market mutual fund (e.g., the Dreyfus Government Cash Management fund) available as a cash sweep option. Deposits held in money market mutual funds are not covered by FDIC insurance but instead receive more limited SIPC protection as further described in the "Information about FDIC and SIPC" section of this document.

### **Free Credit Balance**

As an alternative to either a Bank Sweep Program or a money market mutual fund sweep program, you may elect to use a free credit balance (e.g., Ameriprise Cash) as your money settlement option. Cash held as a free credit balance in an account is not covered by FDIC insurance but instead is considered a cash balance covered under SIPC. AEIS may, but is not obligated to, pay interest on any free credit balance held in your account(s). A free credit balance is not a cash sweep program.

### **Alternatives to Money Settlement Options**

AEIS is not obligated to offer alternative money settlement options that offer a rate of return that equals or is greater than other comparable options. Regardless of the money settlement options made available, you will always be able to buy and sell certain money market mutual funds; brokered certificates of deposit; treasury bills; and other similar products to manage cash in your account. These alternative options for the investment of cash balances are generally expected to offer higher returns than the money settlement options made available to you but may not provide as much liquidity as the money settlement options assigned to your account. Please read any money market mutual fund prospectus carefully before you invest or send money.

**Overview of the Money Settlement Options**

The chart below lays out the various money settlement options available for your account(s) based on account and ownership types.

**Money Settlement Options**

Account Type	Ownership	Brokerage <sup>b</sup>	Non-discretionary Managed Accounts (e.g., SPS Advantage)	Discretionary Managed Accounts (e.g., Active Portfolios, SMA, SPS Advisor)
Nonqualified Accounts	All accounts except for AIMMA ineligible ownerships <sup>a</sup>	AIMMA <sup>1</sup> – Default Ameriprise Cash <sup>2</sup> – Secondary		
	AIMMA ineligible ownerships <sup>a</sup>	Dreyfus Government Cash Management - Wealth Shares - Default Ameriprise Cash <sup>2</sup> – Secondary		
Qualified Accounts	All IRA types, Coverdell ESAs, Custodial/Trusteed qualified plans (e.g. Profit Sharing, Defined Benefit Plans, 401(k)) excluding trustee directed 401(a)	AIMMA <sup>1</sup>		ABISA <sup>1</sup>
	Trustee Directed 401(a)	AIMMA <sup>1</sup>	ABISA <sup>1</sup>	
	TSCA/403(b)	Dreyfus Government Cash Management - Wealth Shares <sup>3</sup>		Dreyfus Government Cash Management – Institutional Shares <sup>3</sup>
Non-Qualified and Qualified Accounts	Ameriprise Bank, FSB as Trustee	Dreyfus Government Cash Management - Institutional Shares <sup>3</sup>		

<sup>a</sup> AIMMA ineligible ownerships include Broker/Dealers, Banks or Trust Companies, Insurance Companies, Mutual Fund Companies and Foreign Institutions (including Foreign non-profit institutions). AIMMA ineligible ownerships may include certain clients of institutional money managers that may not be eligible for AIMMA due to investment policy considerations. AEIS may at its discretion deem an account or person to be ineligible for AIMMA if AEIS becomes aware that the account is prohibited by either banking regulations or ownership rules from participating in AIMMA. Accounts qualifying as Pattern Day Traders are not eligible to have AIMMA, ABISA or a money market sweep. The sweep option on these accounts will be changed to Ameriprise Cash.

<sup>b</sup> Product classes are Institutional Brokerage, Basic Brokerage, Basic Brokerage Qualified, ONE, Smart Trade, Smart Trade Tax Qualified, and Tax Sheltered Cust Brokerage. Ameriprise Brokerage 529 plans are also ineligible for AIMMA and cash positions will be held in either a non-interest bearing free credit balance or the 529 Plan's money market portfolio or equivalent.

<sup>1</sup> AIMMA and ABISA are money settlement options where cash is swept into interest-bearing bank deposit accounts at FDIC insured banks.

<sup>2</sup> Ameriprise Cash is a free credit balance held in your account by American Enterprise Investment Services, Inc. (AEIS), an affiliate clearing broker of Ameriprise Financial Services, LLC, and is covered by SIPC up to applicable limits.

<sup>3</sup> For more information about Dreyfus funds, visit dreyfus.com.

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## Money Settlement Option Disclosures

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Uninvested cash balances will sweep daily into the designated or default money settlement option following the date of deposit. Assignment of a designated cash sweep option will be processed upon receipt of a signed application or other instruction. Funds deposited prior to the cash sweep option assignment will be held in a non-interest-bearing free credit balance.

For current sweep rates, go to [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates).

### Tax Information for Money Settlement Options

If you hold a bank deposit or free-credit balance money settlement option in a taxable account, any interest you earn will be taxed as ordinary income in the year received. AEIS will send you a Form 1099-INT, Interest Income (if your money settlement option is a bank deposit program or free-credit balance) or 1099-DIV, Dividends and Distributions (if your money settlement option is a money market mutual fund) each year to the extent required by the IRS. If you hold a money settlement option in your tax-deferred retirement account, you will not receive tax reporting until those amounts are distributed from your retirement account.

### Exceptions for margin account customers

In the event that you either become designated as a Pattern Day Trader as defined under FINRA Rule 4210 or you participate in stock or index options strategies creating margin account calls, you will no longer be eligible to have a Bank Sweep Program or a money market mutual fund as your money settlement option for your margin account. If in our sole discretion we determine that either of these two events has occurred, you authorize and acknowledge our right to change your money settlement option for your margin account from a Bank Sweep Program or money market mutual fund sweep program to the free credit balance. Should this occur, you may not receive a separate mailing regarding this change; however, any such change in your money settlement option will be reflected in your account statement and available online at [ameriprise.com](http://ameriprise.com).

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## Ameriprise® Insured Money Market Account

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AEIS offers the Ameriprise Insured Money Market Account ("AIMMA"), a program that provides for the automatic deposit or "sweep" of available cash balances in your account into Deposit Accounts at unaffiliated banks and our affiliate bank, Ameriprise Bank, FSB ("Ameriprise Bank") (altogether "Program Banks"). AIMMA is available for most Ameriprise accounts and ownerships except for certain discretionary investment advisory accounts in tax-qualified ownerships. With AIMMA, your available cash balances from securities transactions, dividend and interest payments and other activities in your eligible accounts will automatically be deposited through the use of the IntraFi Sweep service ("IS") offered by Intrafi, LLC ("Intrafi") into Deposit Accounts in Program Banks listed on our Bank List as defined below.

### Interest Rates and Tiers

Interest rates on the Deposit Accounts will be tiered based on the cash balances in individual accounts ("Interest Rate Tiers"). We do not aggregate accounts for purposes of interest rate tiers. We reserve the right to change the methodology used to determine the interest rates in our sole discretion and without prior notice to you. The rate is generally based on a variety of factors including, but not limited to, prevailing economic and market conditions.

### Conflict of Interest

Our affiliate, Ameriprise Bank, FSB, participates in AIMMA. Deposits at Ameriprise Bank provide the Bank with a stable, cost-effective source of lendable funds. Ameriprise Bank, like unaffiliated Program Banks, uses the deposits it receives through its participation in AIMMA for its lending and investment programs, and it earns revenue based on the difference (or "spread") between the interest rate it receives from its investment and lending programs and what it pays to obtain the deposits. The deposit amounts to be placed at each bank, established by Ameriprise Bank and IntraFi may result in Ameriprise Bank securing a higher position in the Bank List and thus receive higher deposits than other Program Banks.

You may contact your Ameriprise financial advisor or access our website at [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates) to view the current Bank List and the current interest rates for each Interest Rate Tier. If you do not have an Ameriprise financial advisor or access to the internet, a copy of this information may be obtained by contacting an Ameriprise Financial client service representative at 1.800.862.7919. Under ordinary business conditions, changes to the interest rates will be posted at [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates) three to five business days prior to their effective date.

Funds deposited into Deposit Accounts (principal and accrued interest) by AEIS on your behalf are eligible for pass-through FDIC insurance up to \$250,000 per depositor, per bank, in each ownership category, if certain conditions are met. AEIS is not a bank and is not FDIC insured. Your coverage begins when the deposits are placed into the Program Banks subject to applicable limits. (see FDIC insurance section below for a description of the account types included in a particular ownership category). The AIMMA program is designed to allocate deposits in Banks of up to the \$500,000 FDIC limit for joint accounts. AEIS will use reasonable efforts to place not more than \$246,250 (or \$500,000 for joint accounts) of your available cash for each individual ownership category and up to \$492,500 for each joint account in a Program Bank.

AEIS will open Deposit Accounts as your agent at additional Banks so that funds within a particular account that are in excess of the pre-set bank limit stated above may be swept to accounts at other Banks, which are also eligible for FDIC deposit insurance up to an aggregate limit of \$2.5 million or \$5 million for joint accounts.

If your available cash balance in a single account reaches the aggregate AIMMA FDIC limit of \$2.5 million (or \$5 million for joint accounts), excess funds will continue to be deposited in the Deposit Accounts, into a single bank (the "Excess Bank") **but will generally not be eligible for FDIC coverage based upon regulation. Any amount above \$250,000 deposited in a single Bank, including the Excess Bank, will not be eligible for FDIC deposit insurance.**

### Bank List and the Excess Bank

The current Bank List of available Banks where your funds may be deposited is available online at [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates), or by calling 800.862.7919. The Bank List applicable to you can be determined based on the ownership of your account. The column marked "Bank List" lists the Banks in the general order in which the Deposit Accounts will be opened for you and the order in which your funds will be deposited. The Bank List also includes at least two Excess Banks, which are Banks that will accept funds after your total funds deposited reach \$2.5 million for individual accounts, or \$5 million for joint accounts. You should review the Bank List carefully and often.

You may not change the order in which your funds are deposited in any of the Banks on the Bank List. However, you may at any time designate any

Bank(s) as ineligible to receive your funds for any particular account by calling 800.862.7919 or through your financial advisor. If you use your discretion to exclude a Bank this will generally result in funds being deposited into Deposit Accounts at the next available Bank on the Bank List which has capacity to take deposits. Designating banks on the Bank List as being ineligible to receive funds may reduce the amount of FDIC coverage available to you in AIMMA.

You may not designate all the Banks on the list as ineligible to receive your funds. In addition, you may at any time instruct us to remove funds from a Bank, and you may designate that Bank as ineligible to receive future deposits. Unless you direct us to place your funds in a different investment, your funds from a bank you designate as ineligible to receive deposits will be deposited in Deposit Accounts at the first available Bank listed on the Bank List, as amended by you.

In some circumstances, a Bank on the Bank List may be unable to accept the funds in your account. If a Bank is unable to accept the funds in your account on a day your account has funds to deposit, your accounts funds will be deposited in the next available Bank on the Bank List. **As discussed in the "Accounts are not Aggregated for FDIC Insurance Purposes" subsection below, AEIS does not aggregate your accounts to ensure you receive the maximum FDIC insurance available by ownership category. Instead, AEIS attempts to maximize FDIC insurance on an account-by- account basis.** Bank capacity and market conditions may cause deposits related to your account at any one Bank to exceed maximum FDIC insurance allowable. As a result, a portion of your deposits may be uninsured. In such event, AEIS will use reasonable efforts to deposit your funds at the next available Bank which has capacity to take deposits in order to increase FDIC insurance.

By accepting AIMMA as your money settlement option, you agree to accept the proprietary algorithm applied by IntraFi, which determines the Banks into which your deposits are placed based on the Bank List published at ameriprise.com/sweepates. You also understand and agree that the order of the banks will change periodically.

#### **Changes to the Bank List**

The Bank List will change from time to time. One or more of the Banks included on the Bank List may be replaced with a Bank not previously included on the Bank List, or a Bank may be deleted from the Bank List, and thus the order in which the funds are deposited in the Banks will change. In general, we will provide notification of changes to the Bank List via our website and will also communicate via your quarterly client statement the addition of any Bank to the Bank List prior to that Bank being added. We will, in the normal course of business, publish changes to the Bank Lists at least five business days prior to the effective date of the change to give you time to review the list and continue to accept the application of the IntraFi algorithm to the revised Bank List. If a Bank is unable to accept deposits (for regulatory or other reasons), or if the sequence of the Bank List has changed, we may not be able to provide you with advance notice. If a bank no longer makes the Deposit Accounts available through IS, your funds will be transferred to Deposit Accounts at the next available Bank on the Bank List. In order to avoid having funds deposited at a bank with which you may have an existing relationship, it is your obligation to frequently review the Bank List and the Banks where your funds are deposited through the AIMMA program and the application of the IntraFi algorithm.

#### **Accounts Not Aggregated for FDIC Insurance Purposes**

AEIS will not aggregate accounts held in the same ownership category when depositing your funds in each Bank. **This means that if you have multiple accounts with Ameriprise Financial in the same ownership category that have balances within AIMMA, you may not receive the maximum amount of FDIC deposit insurance available unless you monitor to ensure balances do not exceed the applicable coverage limits in any particular Bank on the Bank List.**

- For example, a deposit into a single individual account of \$450,000 would generally allocate \$246,250 to the first Bank on the Bank List and the remaining \$203,750 to the second Bank on the Bank List, so the funds at each Bank would be eligible for up to \$250,000 in FDIC coverage. However, if the same \$450,000 was deposited equally into two separate individual accounts in the same ownership category, each account would allocate the full \$225,000 to the first Bank on the Bank list, so the \$450,000 in funds would be held at the same Bank and only be eligible for up to \$250,000 in FDIC coverage, leaving \$200,000 uninsured. In this scenario, you could designate the first Bank as ineligible to receive funds for one of the individual accounts to allocate the funds in separate Banks and help maximize your FDIC coverage.

While certain ownership categories (e.g., revocable trusts) may be eligible for additional FDIC deposit insurance with each Bank based on factors such as the number of beneficial owners, AEIS does not take this into account and uses the pre-set bank limits described above when allocating deposits among Program Banks, so funds deposited in AIMMA in these ownerships may not take advantage of all available FDIC deposit insurance as illustrated on the FDIC.gov website.

Please read carefully the section titled "Information About FDIC Insurance and SIPC" for more information about applicable FDIC coverage limits. It is important to note that cash held at AIMMA Banks will be aggregated with any other deposit account (including certificates of deposit) held in the same ownership category you may maintain at that Bank, including other Ameriprise accounts you hold that have cash sweep deposits. If your aggregated deposits at that Bank exceed FDIC limits, your deposits in excess of the limits will not be eligible for FDIC coverage. You are responsible for monitoring the total amount of deposits that you have with each Bank, including deposits made through multi-bank deposit programs offered by other broker-dealers, in order to determine the extent of deposit insurance coverage available to you. Please note, AIMMA is program offered by AEIS that provides pass-through deposit insurance to clients if certain conditions are met. AEIS is not a bank and is not FDIC-insured. Your coverage begins when the deposits are placed into the Program Bank subject to applicable limits. Neither AEIS nor your financial advisor is responsible for any insured or uninsured portion of a Deposit Account. Please note that because each Deposit Account constitutes a direct obligation of the Bank and is not directly or indirectly an obligation of AEIS, cash held at Program Banks is not eligible for SIPC coverage.

You will not have a direct account relationship with the Banks. AEIS, as your agent, will establish the Deposit Accounts for you at each Bank and make deposits to and withdrawals from the Deposit Accounts. AEIS will receive a fee from each Bank. The amount of the fee paid to AEIS will reduce the interest rate paid to you on the Deposit Accounts. You should review carefully the section titled "Information About Your Relationship with Clearing Agent and the Banks."

The AIMMA program is available to most ownership types except the following entities: Banks or Trust Corporations, Broker/Dealers, Insurance Companies, Mutual Fund Companies, Foreign Institutions and Non-Profit Foreign Entities, and TSCA/403(b) plans. These organizations and plan types are prohibited from using AIMMA as a sweep option, either by banking regulation or qualified ownership rules. Please consult with your Ameriprise financial advisor for details concerning eligibility. AEIS may at its discretion deem an account(s) to be ineligible for AIMMA if AEIS becomes aware that the account is prohibited by either banking regulations or ownership rules from participating in AIMMA.

#### **Compensation**

For AIMMA, each Bank will compensate AEIS for the placement of funds based on the average daily deposit balances at that Bank. The total compensation paid by each Program Bank to AEIS is negotiated and is based on a reference rate, such as the Federal Funds Rate, plus or minus a spread. Of this amount, IntraFi may receive compensation from AEIS of up to 10 basis points as a service provider for AIMMA. AEIS retains the balance of the amount paid by the participating Banks, less the account of interest paid to you and the compensation to IntraFi.

For AIMMA, you can find more information, including an up to date example of the Compensation we receive from unaffiliated banks participating in AIMMA at [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates).

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## **Ameriprise® Bank Insured Sweep Account**

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AEIS offers the Ameriprise Bank Insured Sweep Account ("ABISA"), as the money settlement option for discretionary investment advisory accounts in a tax-qualified ownership, and for certain non-discretionary investment advisory qualified accounts with trustee-directed pooled investment 401(a) ownerships. With ABISA, your available cash balances from securities transactions, dividend and interest payments and other activities in your eligible accounts will automatically be deposited through the use of the IS offered by IntraFi into an interest-bearing FDIC insured Deposit Account at Ameriprise Bank. Any uninvested cash held in your discretionary investment advisory accounts in a tax-qualified ownership may be deposited or invested in deposits of Ameriprise Bank or any other banking affiliate of Ameriprise Financial Services, LLC in connection with any insured deposit money settlement option offered by Ameriprise Financial Services, LLC and as further described below.

Interest rates on the Deposit Accounts are tiered and will vary based upon your account cash balance as well as prevailing economic and business conditions. You may contact your Ameriprise financial advisor or access our website at [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates) to view the current interest rates for each Interest Rate Tier. If you do not have an Ameriprise financial advisor or access to the internet, a copy of this information may be obtained by contacting an Ameriprise Financial client service representative at 800.862.7919. Under ordinary business conditions, changes to the interest rates will be posted at [Ameriprise.com/sweeprates](http://Ameriprise.com/sweeprates) three to five business days prior to their effective date.

Funds deposited into Ameriprise Bank by AEIS on your behalf are eligible for pass-through FDIC insurance up to \$250,000 in principal and accrued interest per depositor in each ownership category if certain conditions are met. AEIS will not open Deposit Accounts at any additional Banks so that funds in excess of the \$250,000 limit stated above may be swept to accounts at other Banks. If the cash balance in your account reaches the pre-set limit, excess funds above \$250,000 will continue to be deposited in the Deposit Account but will not be eligible for FDIC coverage based upon regulation. Any amount above \$250,000 deposited in the Bank will not be eligible for FDIC deposit insurance. Please note that because each Deposit Account constitutes a direct obligation of the Bank and is not directly or indirectly an obligation of AEIS, cash held in the Deposit Account is not eligible for SIPC coverage.

Please read carefully the section titled "Information About FDIC Insurance and SIPC" for more information about applicable FDIC coverage limits. It is important to note that ABISA deposits at Ameriprise Bank will be aggregated with any other deposit account you may maintain at Ameriprise Bank in the same ownership category. If your aggregated deposits at Ameriprise Bank exceed FDIC limits, your deposits in excess of the limits will not be eligible for FDIC coverage. **You are responsible for monitoring the total amount of deposits that you have with Ameriprise Bank, including deposits made through multi-bank deposit programs offered by us or by other broker-dealers, in order to determine the extent of deposit insurance coverage available to you. Please note, ABISA is program offered by AEIS that provides pass-through deposit insurance to clients if certain conditions are met. AEIS is not a bank and is not FDIC-insured. Your coverage begins when the deposits are placed into the Ameriprise Bank subject to applicable limits.** Neither AEIS nor your financial advisor is responsible for any insured or uninsured portion of a Deposit Account. Please note that because each Deposit Account constitutes a direct obligation of Ameriprise Bank and is not directly or indirectly an obligation of AEIS, cash held at Ameriprise Bank is not eligible for SIPC coverage.

**It is important to note that Ameriprise Bank also participates in the Ameriprise Insured Money Market Account (AIMMA), our multi-bank insured deposit program. By participating in AIMMA, Ameriprise Bank may receive sweep deposits from other accounts that you own, including deposits from other accounts that are not eligible for ABISA. Thus, it is possible that your Ameriprise accounts could have multiple deposit accounts at Ameriprise Bank, which could lead to your aggregated deposits at Ameriprise Bank exceeding FDIC limits.** Any deposits (including certificates of deposit) that you maintain in the same ownership capacity directly with Ameriprise Bank will be aggregated with deposits in your Deposit Accounts at Ameriprise Bank for purposes of calculating the maximum FDIC coverage allowable. **You are responsible for monitoring the total amount of deposits that you have with Ameriprise Bank, in order to determine the extent of FDIC deposit insurance coverage available to you. Ameriprise Bank, AEIS and your financial advisor are not responsible for any uninsured portion of a Deposit Account.**

You will not have direct account relationship with Ameriprise Bank. AEIS, as your agent, will establish the Deposit Account for you at Ameriprise Bank and make deposits to and withdrawals from the Deposit Account as described herein. AEIS will receive a fee from Ameriprise Bank. You should review carefully the section titled "Information About Your Relationship with Clearing Agent and the banks."

The ABISA program is available only to certain discretionary investment advisory accounts in a tax-qualified ownership. AEIS may at its discretion deem an account to be ineligible for ABISA if AEIS becomes aware that the account is prohibited by either banking regulations or ownership rules from participating in ABISA.

### **Compensation**

For ABISA, Ameriprise Bank will not compensate AEIS, but will reimburse AEIS for its direct out of pocket expenses related to the sweep services provided. Ameriprise Bank uses the deposits it receives through its participation in AIMMA and ABISA for its lending and investment programs, like unaffiliated Banks in the AIMMA program, it earns revenue based on the difference (or "spread") between the interest it receives from its investment and lending programs and what it pays to obtain the deposits.

### **Exceptions to Deposit Procedures**

In some circumstances, Ameriprise Bank may be unable to accept your funds. If Ameriprise Bank is unable to accept your funds on a day you have funds to deposit, your funds may be held as a free credit balance in your account or may be directed to a money market mutual fund, as more fully described in "IS Service/Sweep Contingency Plans and Procedures" below.

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## Information about Bank Sweep Programs

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### Deposit Service

Bank Sweep Programs make available to you a money market deposit account (“MMDA”) - a type of savings deposit- and a linked transaction account, which could be a NOW account (“TA”), at one or more of the Banks. When funds are first available for deposit, AEIS, as your agent, will deposit available cash balances in your account into the MMDA and a linked TA at one or more of the Banks on the then-current Bank List in the general order listed on the Bank List for AIMMA and into a linked TA at Ameriprise Bank for ABISA. All withdrawals will be made from the TA at a Bank. As necessary to satisfy debits in your account (securities purchases, check writing, debit card, account fees, etc.), funds will be transferred from the MMDA to the related TA at each Bank. Transfers from the MMDA to the TA and withdrawals from the TA are discussed under “Withdrawal Procedures”.

If your account has a Bank Sweep Program as the money settlement option, available cash will be swept daily. Before cash has been swept into either AIMMA or ABISA, it will be held in as a non-interest-bearing free credit balance in your account with AEIS. Cash held with AEIS is not a bank obligation and is not insured by the FDIC, but is covered by SIPC up to applicable limits.

### Withdrawal Procedures

All withdrawals necessary to satisfy debits in your account will be made by AEIS as your agent. A debit is created to satisfy a securities purchase or a request for a withdrawal of funds from your account, and if applicable, when you write a check on your account, make payments via the online bill pay service or withdraw funds through your debit card. Withdrawals from your account are not drawn directly against the Deposit Accounts established for you at the Banks but instead from your account.

For AIMMA, if a withdrawal of funds from the Deposit Accounts is necessary to satisfy a debit, funds will be withdrawn from the TAs at the Banks in the reverse order in which Banks appear on the Bank List. Funds will be withdrawn first from the Bank lowest on the Bank List and last from the first Bank on the Bank List. For ABISA, funds will be withdrawn from the TA at Ameriprise Bank. If funds in the TA are insufficient to satisfy a debit, funds in the related MMDA at that Bank will be transferred to the TA to satisfy the debit, plus any funds necessary to maintain any TA threshold amount. If there are insufficient funds in the Deposit Accounts to satisfy the debit, AEIS will withdraw funds from other available sources as described in the Ameriprise Brokerage Client Agreement.

Federal banking regulations limit the transfers from an MMDA to a total of six (6) during a monthly statement cycle. At any point during a month in which transfers from an MMDA at a Bank have reached the applicable limit, all funds will be transferred from that MMDA to the linked TA at the Bank until the end of that month. The limits on MMDA transfers will not limit the number of withdrawals you can make from funds on deposit at a Bank or the amount of FDIC insurance coverage for which you are eligible. Deposits for the remainder of the month into this Bank will be made to the TA. At the beginning of the next month, funds on deposit in the TA will be transferred to the MMDA, minus any threshold amount to be maintained in the TA.

The sweep feature will automatically debit funds from your balance held within a Bank Sweep Program to cover withdrawals made from your account. If you purchase a security, funds will be automatically swept from your balance held within AIMMA or ABISA to your account on settlement date. Withdrawals cannot be made directly from any individual Bank. If you elect to close your account, your funds will be withdrawn from the bank(s) in which they are held and distributed per your instructions. Due to federal banking regulations each Bank reserves the right to require seven business days' prior notice before any cash balances can be withdrawn from your Deposit Accounts. The Banks have informed us that they do not currently intend to exercise this right.

### Information about your relationship with clearing agent and the Program Banks

AEIS is acting as your agent in establishing the Deposit Accounts at each bank, depositing funds into the Deposit Accounts, withdrawing funds from Deposit Accounts and transferring funds among Deposit Accounts. Deposit Account ownership will be evidenced by a book entry on the account records of each bank showing the Deposit Account as an agency account held by AEIS for the benefit of you and other AEIS customers and by records maintained by AEIS as your agent. No evidence of ownership, such as a passbook or certificate, will be issued to you. Your account statements will reflect the balances in the Deposit Accounts at the banks, and you should retain the account statements for your records. All transactions with respect to the Bank Sweep Programs must be directed by AEIS. The banks will not accept instructions from you with respect to the Deposit Accounts or provide you with information concerning the Deposit Accounts.

Each Deposit Account constitutes a direct obligation of a bank and is not directly or indirectly an obligation of AEIS. You can obtain publicly available financial information concerning each Bank at [ffiec.gov/nic](http://ffiec.gov/nic) or by contacting the FDIC Public Information Center by mail at L. William Seidman Center, Virginia Square, 3501 North Fairfax Drive, Arlington, Virginia, 22226 or by phone at 703.562.2200. AEIS does not guarantee in any way the financial condition of the banks or the accuracy of any publicly available financial information concerning such banks.

### Interest on Cash Sweep Balances in Your Deposit Accounts

The interest income you receive will vary based upon the value of deposits related to your particular account in the Deposit Accounts and can fluctuate daily depending on prevailing economic and business conditions. In general, clients with greater cash sweep balances in a particular account may receive a higher interest rate than clients with lower balances in a particular account. We do not aggregate accounts for purposes of assigning Interest Rate Tiers. AEIS will determine the balance in your account each day. The previous day's account balance will determine your account's eligibility for a particular Interest Rate Tier. The current Bank Sweep Program Interest Rate Tiers are as follows:

\$0.00 to \$4,999.99,  
\$5,000.00 to \$24,999.99,  
\$25,000.00 to \$49,999.99,  
\$50,000.00 to \$99,999.99,  
\$100,000.00 to \$249,999.99,  
\$250,000.00 to \$499,999.99,  
\$500,000.00 to \$999,999.99,  
\$1,000,000.00 to \$4,999,999.99  
and \$5,000,000.00 and over.

These Interest Rate Tiers are subject to change at AEIS's discretion. **In AIMMA, you will receive the same interest rates on the funds in the MMDA and TA at each Bank. All Banks in AIMMA will utilize the same Interest Rate Tiers, and will pay the same rate of interest on the Deposit Accounts within each Interest Rate Tier.**

For the most current Bank Sweep Program Interest Rate Tiers, please access our website at [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates) or contact our service line at 800.862.7919 to obtain interest rate information. Interest will accrue on Deposit Account balances from the day funds are deposited into the Deposit Accounts at a bank through the business day preceding the date of withdrawal from your Deposit Accounts at the bank. Interest will be compounded daily and credited monthly. The interest rates paid with respect to the Deposit Accounts at a bank may be higher or lower than the interest rates available to depositors making deposits directly with the bank, with other depository institutions in comparable accounts, or in other available money settlement options made available through AEIS. You should compare the terms, conditions, interest rates, any required minimum amounts and other features of the Bank Sweep Program with other accounts and alternative investments to ensure this product meets your needs.

#### **Information About Your Bank Sweep Program Accounts**

For each statement period, your account statement will reflect for AIMMA and ABISA:

- The closing balance in each Bank Sweep Program
- The closing balance you hold at each bank
- Interest earned on your Deposit Account balances
- Monthly interest rate
- Bank Sweep Program Transaction History

Your financial advisor or our service line can assist you if you have any questions about how your account statement reflects the Deposit Account balances at each Bank. You may obtain information about the Deposit Accounts, including balances at each bank and the current and future interest rates, by accessing your account statement online at [ameriprise.com](http://ameriprise.com). If you do not currently have access to your account at [ameriprise.com](http://ameriprise.com) and wish to have access, please contact your advisor. If you do not have an advisor or internet access, please call our service line at the number listed above to obtain information.

AEIS may, in its sole discretion, discontinue your use of AIMMA or ABISA as a money settlement option. AEIS will notify you of such action and provide you information on the alternative money settlement option chosen and other options available to you.

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### **Information about FDIC and SIPC**

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#### **FDIC Insurance**

The Deposit Accounts (including principal and accrued interest) are insured by the FDIC, an independent agency of the U.S. Government, up to \$250,000 for all deposits held in the same ownership category. Generally, any accounts or deposits that you may maintain directly with a Bank, or through any other intermediary, in the same ownership category in which the Deposit Accounts are maintained would be aggregated with the Deposit Accounts for purposes of the \$250,000 FDIC insurance limit. In the event that a Bank fails, the Deposit Accounts are insured, up to \$250,000, for principal and interest accrued to the date the Bank is closed.

Under certain circumstances, if you become the owner of deposits at a Bank because another depositor dies, beginning six months after the death of the depositor, the FDIC will aggregate those deposits for purposes of the \$250,000 FDIC insurance limit with any other deposits that you own in the same ownership category at the Bank. Examples of accounts that may be subject to this FDIC policy include joint accounts, "payable on death" accounts, and certain trust accounts. The FDIC provides a six-month "grace period" to permit you to restructure your deposits to obtain the maximum amount of deposit insurance for which you are eligible.

**You are responsible for monitoring the total amount of deposits that you hold with a Bank, directly or through an intermediary, in order for you to determine the extent of deposit insurance coverage available to you on your deposits, including the Deposit Accounts.**

We are not responsible for any insured or uninsured portion of the Deposit Accounts or any other deposits. In the event that Federal deposit insurance payments become necessary, payments of principal plus unpaid and accrued interest will be made to you. There is no specific time period during which the FDIC must make insurance payments available, and we are under no obligation to credit your brokerage account with funds in advance of payments received from the FDIC. Furthermore, you may be required to provide certain documentation to us to provide to the FDIC before insurance payments are made. For example, if you hold deposits as trustee for the benefit of trust participants, you may be required to furnish affidavits and provide indemnities regarding an insurance payment. If your Deposit Accounts or other deposits at a Bank are assumed by another depository institution pursuant to a merger or consolidation, such deposits will continue to be separately insured from the deposits that you might have established with the acquiror until (i) the maturity date of any time deposits that were assumed or (ii) with respect to deposits that are not time deposits, the expiration of a six-month period from the date of the acquisition. Thereafter, any assumed deposits will be aggregated with your existing deposits with the acquiror held in the same capacity for purposes of Federal deposit insurance. Any deposit opened at the acquiror after the acquisition will be aggregated with deposits established with the acquiror for purposes of Federal deposit insurance. The application of the \$250,000 FDIC insurance limit is illustrated by several common factual situations discussed below.

**Individual Customer Accounts.** Deposits of a Bank held by an individual in an account in the name of an agent or nominee of such individual (such as the Deposit Accounts held through us) or held by a custodian (for example, under the Uniform Gifts to Minors Act or the Uniform Transfers to Minors Act) are not treated as owned by the agent, nominee, or custodian, but are added to other deposits of such individual held in the same ownership category (including funds held in a sole proprietorship) and are insured up to \$250,000 in the aggregate. Deposits held through a qualified tuition savings program (529 Plan) will be insured as deposits of the participant and aggregated with other deposits of the participant if the arrangement and the name of the participant are identified on our account records.

**Joint Accounts.** An individual's interest in deposits of a Bank held under any form of joint ownership valid under applicable state law may be insured up to \$250,000 in the aggregate, separately and in addition to the \$250,000 allowed on other deposits individually owned by any of the co-owners of such accounts (hereinafter referred to as a "Joint Account"). For example, a Joint Account owned by two persons would be eligible for insurance coverage of up to \$500,000 (\$250,000 for each person), subject to aggregation with each owner's interests in other Joint Accounts at the Bank. Joint Accounts will be insured separately from individually owned accounts only if each of the co-owners is an individual person and has a right of withdrawal on the same basis as the other co-owners.

**Individual Retirement Accounts (IRAs).** Deposits of a Bank held in an IRA will be insured up to \$250,000 in the aggregate. However the deposits of a Bank held by an IRA will be aggregated with the deposits of the same Bank held by certain employee benefit plans in which the owner of the IRA has an interest. Thus, the owner of an IRA will only be eligible for insurance of \$250,000 for deposits at a Bank held in plans and accounts that are subject to aggregation.

Other Ownership Types. Additional information about the various FDIC ownership categories (e.g. revocable and irrevocable trusts, employee benefit plans, etc.) can be found on FDIC's website: <https://www.fdic.gov/resources/deposit-insurance/financial-products-insured/index.html>.

**Questions about FDIC Deposit Insurance Coverage.** If you have questions about basic FDIC insurance coverage, please contact your financial advisor. You may wish to seek advice from your own attorney concerning FDIC insurance coverage of deposits held in more than one capacity. You may also obtain information by contacting the FDIC, Division of Supervision and Consumer Protection, by mail (550 17th Street, N.W., Washington, D.C. 20429), by phone 1.877.275.3342, 1.800.925.4618 (TDD), by visiting the FDIC website at [www.fdic.gov/deposit/index.html](http://www.fdic.gov/deposit/index.html).

#### **SIPC Coverage**

SIPC is a non-profit membership corporation created by the Securities Investor Protection Act of 1970, funded primarily by its member securities brokerage firms registered with the U.S. Securities and Exchange Commission. SIPC provides protection against custodial risk to clients of securities brokerage firms, like Clearing Broker, in the event such firms become insolvent. Unlike FDIC insurance, SIPC does not insure against the loss of your investment. Nor does SIPC insurance insure the quality of investments or protect against a decline or fluctuations in the value of your investment. SIPC protects each client's securities and cash held in a client's brokerage account in the form of a free-credit balance at an insolvent brokerage firm. SIPC protects against the loss of customer securities and cash up to a total of \$500,000 (of which up to \$250,000 may be cash) per customer in each separate ownership category under SIPC rules.

**Because cash held in bank deposit account within AIMMA and ABISA are covered under FDIC, they are not brokerage deposit products, and therefore are not eligible for SIPC coverage. However, until cash in your account is deposited into bank deposit accounts, that cash is covered by SIPC up to the applicable limit.**

If you have questions about SIPC coverage and additional excess SIPC coverage, please contact your financial advisor or visit our website at [ameriprise.com](http://ameriprise.com). You may also obtain information about SIPC coverage, including a brochure that describes SIPC and SIPC insurance, by accessing the SIPC website at [www.sipc.org](http://www.sipc.org).

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### **IS Service/Sweep Contingency Plans and Procedures**

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While we are informed that the IS service is supported by adequate business continuity and recovery plans, there can be no assurances that the IS service will always be available, or that we will always be able to sweep your funds as planned. In the event that deposits cannot be placed through the IS service or the sweep program is otherwise disrupted, there may be a delay to the daily sweep process such that your cash assets may temporarily be unswept. In addition, an outage in the IS service may cause a delay in the calculation and/or crediting to your account(s) of the interest payment due on your AIMMA or ABISA deposits.

In the event that cash cannot be swept from your account(s) (due to an outage in the IS service or otherwise), you authorize AEIS to take the following steps pending restoration of the IS service:

- To receive and hold, as either a free credit balance in your account(s), in a single bank FDIC-insured sweep program, all NEW funds directed to your account(s) during the service outage, and
- To redeem your sweep balance, in part or in total, and maintain the balance as a free credit balance in your account(s), in a single bank FDIC-insured sweep program.

Cash held as a free credit balance in an account or in a money market mutual fund is not covered by FDIC insurance but instead is considered a cash balance covered under SIPC. AEIS may, but is not obligated to, pay interest on any free credit balance held in your account(s) as a result of an outage in the IS service. The interest rate applied to your free credit balance, if any, will be posted to our website, [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates), and on your Ameriprise account statement.

A "single bank FDIC Insured sweep program" means we will cause your funds to be swept to a single bank which will provide no more than \$250,000 in FDIC coverage (\$500,000 for joint accounts). **Cash held in your account(s) in excess of FDIC limits will not be eligible for FDIC insurance. You are responsible for monitoring the cash balance in your account(s) for purposes of determining the limits of FDIC insurance coverage. We are not responsible for any uninsured portion of the cash balance you maintain in your account(s).**

In its response to any IS or other sweep program service outage, AEIS may at its discretion establish a money market mutual fund as the money settlement option for your account(s). If a money market mutual fund is established as the sweep option for your account (s), all new funds directed to your account(s) will be used to purchase shares in the money market mutual fund. AEIS may also redeem your AIMMA balance and purchase shares in the money market mutual fund.

At such time as the IS service is again available, AEIS may reestablish AIMMA and/or ABISA as the money settlement option for your account(s). In that event, all deposits of new funds directed to your account(s) will again be processed through the IS service, as will funds that are held as a free credit balance or which have been placed in the single bank FDIC-insured sweep program. If a money market mutual fund is established as your sweep option due to the service outage, we will redeem all shares of the money market mutual fund sweep and will deposit the redemption proceeds through the IS service.

During any disruption to the sweep program or to the IS service, AEIS will provide you with notice of the actions it takes (which notice may be through your account statement, via electronic mail, and/or by posting to our website, [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates)) and with information regarding the money settlement option chosen for your account(s), as well as any other options available to you. We will provide such information to you as promptly as possible and as required by law or regulation.

You may also direct us at any time to liquidate any assets held in any money settlement option and hold the proceeds as a free credit balance in your account(s) or remit them to you.

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### **AIMMA Deposit Capacity - Contingency Procedures**

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The AIMMA program's ability to sweep available cash balances to participating program Bank(s) depends on each Bank(s) capacity to accept the deposits. If the program Bank(s) do not have enough capacity to accept additional deposits or reduce existing capacity and AEIS determines that sweeping additional deposits to the Bank(s) is not feasible, you authorize us to automatically move any uninsured cash balances (those in excess of the FDIC insurance limits described above) in your Deposit Account(s) to shares of the Dreyfus Government Cash Management - Wealth Shares money market mutual fund. Purchases of this money market mutual fund will be made at NAV within one business day after cash balances, that cannot be placed with participating program Bank(s), move into your account or existing cash balances in your Deposit Account(s) become uninsured or are not able to be placed with participating program Bank(s). To the extent there is sufficient capacity within the AIMMA program such that a program Bank could accept new deposits, those deposits will continue to be placed in the Deposit Accounts in accordance with the procedures described in the Bank List section.

If neither the Banks nor the money market mutual fund provide sufficient deposit capacity to accept additional cash deposits, the cash in your account will be held as a free credit balance. If your account maintains investments in the money market mutual fund made through the AIMMA program or within any free credit balances, cash you use in your account will be first be deducted from any free credit balances, then redeemed from the money market mutual fund, and finally withdrawn from the Bank Deposit Account balances.

AEIS will attempt to reallocate cash balances from the money market mutual fund to the Deposit Accounts of the Banks to help enhance your potential FDIC coverage. You authorize AEIS to liquidate your money market mutual fund shares in an amount equal to the amount of program Bank capacity available to you. This amount will then be allocated to the Banks on the Bank List as described above. AEIS will review for potential reallocations into Deposit Accounts periodically, and at least on a monthly basis. We may not be able to re-allocate all of your funds in the money market mutual fund to the Banks on the Bank List on the same day, and available cash balances may be invested in the money market mutual fund even after there has been a reallocation of some or all of your funds from the money market mutual fund to the Banks if there is insufficient Bank capacity available.

Your account statement will reflect the location and type of all your deposits within the AIMMA program. If we implement the money market mutual fund contingency, we would inform you by updating our website [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates) as soon as administratively feasible and notifying you in your next quarterly statement. We anticipate the use of the money market mutual fund would be temporary and we would notify you when we are able to remove the money market mutual fund feature's use from the AIMMA program. While you cannot designate the money market mutual fund as ineligible to receive your funds like with the program Banks, you can affirmatively elect to use a free credit balance as your money settlement option.

**Cash swept into the money market mutual fund is not insured by FDIC, NCUA or any federal agency, is not deposits or obligations of, or guaranteed by any financial institution, and involves investment risks including possible loss of principal and fluctuation in value.** The dividends earned on shares of the money market mutual fund will not be payable in cash but will be reinvested each month into additional shares of the fund at net asset value. The rate of return on the money market mutual fund will generally differ from and may be less than the rate of interest being paid in the Deposit Accounts. Current rates are always available at [ameriprise.com/sweeprates](http://ameriprise.com/sweeprates). Money market mutual funds generally seek to preserve the value of an investment at \$1.00 per share, but there is no assurance that will occur, and it is possible to lose money. Details about the Dreyfus Government Cash Management - Wealth Shares fund are available at <https://www.ameriprise.com/binaries/content/assets/ampcom/dreyfus-government-cash-management-fund-wealth-class-prospectus.pdf>.

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## Payment for Order Flow

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Ameriprise Financial Services, LLC receives no payment for routing orders to execution venues (sometimes referred to as payment for order flow). Order routing is the sole responsibility of AEIS and AEIS does not receive payment for routing orders at this time. However, AEIS reserves the right to receive payment for directing orders to a particular broker or dealer through which your transactions are executed. In the event we do so, these payments will be included in our Order Routing Report published quarterly on ameriprise.com/606. Such payment would be considered compensation to us, and the source and amount of any compensation will be disclosed to you upon your written request. The potential for receipt of order flow payment or trading profits is not a factor in the decision to direct an order to a particular broker or dealer. With respect to Over The Counter (OTC) equity transactions and listed option transactions, compensation would generally be in the form of a per share or per contract cash payment.

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## Electronic Fund Transfer Disclosure

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**Applicability of these disclosures.** These disclosures, and the rights and obligations contained therein, apply only to customers who are natural persons whose account was established primarily for personal, family or household purposes. They are applicable only to accounts and transactions governed by the Federal Electronic Fund Transfer Act and the federal Consumer Financial Protection Bureau's Regulation E and (for Massachusetts residents) Chapter 167B of the Massachusetts General Laws and any regulations promulgated thereunder. Throughout this Electronic Fund Transfer Disclosure, (the "EFT Disclosure"), "you", "your" and "yours" refer to the account holder(s) who are obligated on the brokerage account. "We", "us", and "our" refer to the Introducing Broker, Clearing Broker and/or Ameriprise Financial.

**Types of Electronic Fund Transfers.** If you sign the appropriate documentation as required by us, you may make the following types of electronic funds transfers to or from your account: preauthorized payments from your account to third parties.

- 1. Automatic funds transfer ("AFT").** Transactions made through the Automated Clearing House system between your account and accounts at financial institutions; direct deposit of funds to your account; and telephone transfers.
- 2. Limits on Electronic Fund Transfers.** You cannot make any transfers out of your account that exceed the combined asset value of your account as described in your agreement. For any single AFT Transaction, the minimum amount is \$100, and the maximum amount is \$100,000. All electronic fund transfers are limited by the amount of available funds in any account from which the transfer is requested. For security reasons, there may be other limits on electronic fund transfers that you can make.
- 3. Fees.** There is currently no charge for AFT Transactions. We may add or change fees for electronic fund transfers by giving notice to you.
- 4. Error Resolution Notice.** In case of errors or questions about your electronic transfers, you shall call us at 800.862.7919 or write us at 70400 Ameriprise Financial Center, Minneapolis, MN 55474, as soon as you can, if you think your statement or receipt is wrong or if you need more information about a transfer listed on the statement or receipt. We must hear from you no later than 60 days after we sent the FIRST statement on which the problem or error appeared. You must:
  - (1) Tell us your name and account number (if any).
  - (2) Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information
  - (3) Tell us the dollar amount of the suspected error. If you tell us orally, we may require that you send us your complaint or question in writing within 10 business days.

We will determine whether an error occurred within 10 business days (20 business days if the transfer involved a new account) after we hear from you and will correct any error promptly. If we need more time, however, we may take up to 45 days (90 days if the transfer involved a new account, a point-of-sale transaction, or a foreign-initiated transfer) to investigate your complaint or question. If we decide to do this, we will credit your account within 10 business days (20 business days if the transfer involved a new account) for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation. If we ask you to put your complaint or question in writing and we do not receive it within 10 business days, we may not credit your account. An account is considered a new account for 30 days after the first deposit is made. We will tell you the results within three business days after completing our investigation. If we decide that there was no error, we will send you a written explanation. You may ask for copies of the documents that we used in our investigation. If a problem or error with respect to your account concerns a transfer to or from a third party (for example a Social Security payment), our investigation may be limited to a review of our own records. If we decide that there was no error, you may want to contact such third party to pursue the matter further. If you comply with the conditions set forth above, in cases in which you think that a transfer from your account was initiated by a third party that was not authorized to initiate any transfers from your account, we will request a copy of the third party's authorization. If we do not request it within 30 calendar days, we will recredit your account for the transfer you think is unauthorized, so you will have the use of your money until we determine whether you had authorized the transfer.

- 5. Business Days.** For purposes of these disclosures, every day is a business day, except Saturdays, Sundays, and federal holidays. Withdrawals done on non-business days are considered made on the following business day.
- 6. Record of Transactions.** Your monthly statement will list all electronic fund transfers made in connection with your account.

- 7. Your Liability for Unauthorized Transactions.** If your statement shows withdrawals or transfers that you did not make or other inaccuracies, you shall tell us at once. If you do NOT tell us within 60 days after the statement was mailed to you, you may not get back any money you lost after the 60 days if we can prove that we could have stopped someone from taking the money if you had told us in time. If you believe that someone has transferred or may transfer money from your account without your permission, you shall call us between 8 a.m. and 5 p.m. Central time or write to us at 70400 Ameriprise Financial Center, Minneapolis, MN.
- 8. Our Liability.** We will be liable to you for any actual losses you suffer if we fail to complete a properly requested electronic fund transfer, or to stop payment of a transfer, in accordance with the terms of this EFT Disclosure or any other written agreement we may have with you. However, we will not be liable to you if an electronic fund transfer cannot be completed or you receive less cash than you requested if, through no fault of ours, your account or bank account does not have enough money to complete the transaction, the transfer will exceed any credit available to you in your account, the funds in your account are subject to legal process or other encumbrance restricting the transfer. There may be other exceptions in our agreements with you.
- 9. Preauthorized Payments.** If you have told us in advance to make regular payments out of your account, you can stop any of these payments. Here's how: You shall call or write to us at 70400 Ameriprise Financial Center, Minneapolis, MN in time for us to receive your request three business days or more before the payment is scheduled to be made. If you call, we may also require you to put your request in writing and send it to us within 14 days after you call. If these regular payments vary in amount, the person you are going to pay will tell you, 10 days before each payment, when it will be made and how much it will be. If you order us to stop one of these payments three business days or more before the transfer is scheduled, and we do not do so, we will be liable for your losses or damages.
- 10. To Find Out if a Preauthorized Transfer Has Been Made** If you have authorized an electronic fund transfer to or from your account, you can call us to find out if the transfer has been made.
- 11. EFT Disclosure Change.** We may change this EFT Disclosure at any time upon notice to you, or without notice to you, whenever the account description or Fund Prospectus is modified. We or any participating bank, financial institution or ATM network may add or remove any or all ATMs or extend, limit or eliminate the services provided at any or all ATMs without notifying you beforehand. From time to time, the rights and responsibilities with respect to electronic fund transfers may change. You shall be notified of any changes as required by applicable law. However, if the change is necessary for security reasons, you do not have to be notified.
- 12. General Disclosure Statements.** Any documentation provided to you that indicates that an electronic fund transfer was made shall be admissible as evidence of such transfer and shall constitute prima facie proof that such transfer was made. The initiation by you of certain electronic fund transfers from your account will, except as otherwise provided in this EFT Disclosure, effectively eliminate your ability to stop payment of the transfer.
- Unless otherwise provided in this EFT Disclosure, you may not stop payment of electronic fund transfers; therefore, you should not employ electronic access for purchases or services unless you are satisfied that you shall not need to stop payment.**
- If your account includes a money settlement option, you may receive interest or dividends on the cash balance in your account as described in the Money Settlement Options section of this disclosure.
- 13. Disclosure of Account Information to Third Parties.** If you give us your written authorization to disclose information about you, your account or the transactions that you make to any person, that authorization shall automatically expire 45 days after we receive it. If an unauthorized disclosure has been made, we must inform you of the particulars of the disclosure within three days after we have discovered that an unauthorized disclosure has occurred.
- 14. Criminal Liability.** If you have authorized an electronic fund transfer to or from your account, you can call us to find out if the transfer has been made. Procuring or using a card, code or other means of electronic access to an account with the intent to defraud is basis for criminal liability.

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### Information Relating to Payments Made to Ameriprise for Deposit

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Checks made payable to Ameriprise Financial or its affiliates may be converted to substitute payment images under Check 21 or to electronic debits processed via Automated Clearing House (ACH) for purposes of efficient payment processing. You can see this method of payment processing by viewing the check image or payment processed on the account from which the payment was made.

If the check is processed electronically, your checking account will be debited for the amount of the check and the debit will appear on your checking account statement. You may elect not to have your check converted to an ACH file by contacting us at 1.800.862.7919.

# Addendum A

Summaries of 2024 mutual fund firms' cost reimbursement payments follow, segmented by mutual fund or 529 plan products:

## Mutual fund cost reimbursement arrangements by fund firm (Jan. 1, 2024 – Dec. 31, 2024)

Fund Firm	Cost Reimbursement Payments from Fund Firms in 2024 <sup>1</sup>	Source of Payment
Allspring	\$11,543,137	Allspring Funds Management, LLC
American Century	\$4,915,763	American Century Investment Services, Inc.
Amundi	\$2,377,325	Amundi Distributor US, Inc.
Blackrock	\$15,688,545	Blackrock Advisors, LLC
BNY Mellon	\$3,550,617	BNY Mellon Securities Corp.
Columbia	\$70,808,065	Columbia Management Investment Distributors, Inc.
Delaware	\$5,000,196	Delaware Distributors L.P.
DWS	\$1,538,490	DWS Distributors, Inc.
Eaton Vance	\$14,320,521	Eaton Vance Distributors, Inc.
Eventide	\$1,835,325	Eventide Asset Management, LLC
Federated Hermes	\$6,262,501	Federated Securities Corporation
Fidelity	\$41,134,951	Fidelity Distributors Corporation
First Eagle	\$6,341,224	FEF Distributors, LLC
Franklin Templeton	\$15,221,074	Franklin Templeton Distributors, Inc.
Goldman Sachs	\$14,734,703	Goldman, Sachs & Co., LLC
Hartford	\$4,851,359	Hartford Funds Management Company, LLC
Invesco	\$15,636,171	Invesco Distributors, Inc.
Janus Henderson	\$9,290,752	Janus Henderson Distributors
John Hancock	\$11,681,724	John Hancock Funds, LLC
JP Morgan	\$23,769,938	J.P. Morgan Distribution Services, Inc.
Lord Abbett	\$13,594,116	Lord Abbett Distributor LLC
Mainstay	\$3,765,828	NYLIFE Distributors, LLC
MFS	\$26,547,983	MFS Fund Distributors, Inc.
Natixis	\$4,008,644	Natixis Distribution L.P.
Neuberger Berman	\$3,748,881	Neuberger Berman LLC
Nuveen	\$8,299,523	Nuveen Securities, LLC
PGIM	\$15,163,343	Prudential Investments, LLC
Principal	\$4,281,969	Principal Financial Services, Inc.
Putnam	\$6,904,368	Putnam Retail Management Limited Partnership
Russel	\$138,051	Russell Investments Financial Services, LLC
T. Rowe Price	\$995,626	T. Rowe Price Investment Services, Inc.
Virtus	\$5,715,841	Virtus Investment Partners, Inc.
Voya	\$1,292,668	Voya Investment Distributors, LLC
<b>Total</b>	<b>\$374,959,222</b>	<b>January 1, 2024, through December 31, 2024</b>

**529 Plan cost reimbursement arrangements by fund firm (Jan. 1, 2024 – Dec. 31, 2024)**

<b>Program Manager or Distributor</b>	<b>State(s)</b>	<b>Cost Reimbursement Payments from Fund Firms in 2024<sup>1</sup></b>	<b>Source of Payment</b>
<b>American Century</b>	KS	\$181,014	American Century Investment Services, Inc.
<b>Blackrock</b>	OH	\$292,471	BlackRock Advisors, LLC
<b>Columbia</b>	SC	\$1,661,231	Columbia Management Investment Distributors, Inc.
<b>Fidelity</b>	CT, NH, OK	\$2,360,788	Fidelity Distributors Corporation
<b>Franklin Templeton</b>	NJ	\$124,485	Franklin Templeton Distributors, Inc.
<b>Goldman Sachs</b>	AZ	\$21,933	Goldman, Sachs & Co. LLC
<b>Hartford</b>	WV	\$18,723	Hartford Securities Distribution Co., Inc.
<b>John Hancock</b>	AK	\$786,803	John Hancock Funds, LLC
<b>JP Morgan</b>	NY	\$470,979	J.P. Morgan Distribution Services, Inc.
<b>Nuveen</b>	CO, MI	\$383,319	Nuveen Securities, LLC
<b>Principal</b>	NM	\$94,750	Principal Funds Distributor, Inc.
<b>Putnam</b>	NV	\$46,227	Putnam Retail Management Limited Partnership
<b>Voya</b>	WI	\$417,427	Voya Investment Distributors, LLC
<b>Total</b>		<b>\$6,860,150</b>	<b>January 1, 2024, through December 31, 2024</b>

<sup>1</sup> "Cost Reimbursement payments" represents amounts received by American Enterprise Investment for the period from January 1, 2024, through December 31, 2024, on retail mutual funds and 529 Plan sales and assets. These figures also include amounts pertaining to participation in Ameriprise-organized conferences.

# APPENDIX

December 2025



## Working in your best interest

### Regulation Best Interest and your brokerage relationship with Ameriprise Financial

Ameriprise Financial has helped millions of people achieve their goals - including working together toward a more confident retirement. For more than 130 years we have been committed to putting our clients first. Our greatest focus has been providing financial solutions for a lifetime, delivering the clear information you expect to receive about your finances and the relationship with a firm and financial advisor who make recommendations in your best interest. This document provides important information regarding your brokerage account and commission-based securities products.

We are proud to adhere to the consumer protection principles of putting our clients' interests first and transparency. That is why we are committed to the Securities and Exchange Commission's ("SEC") Regulation Best Interest that requires us to act in your best interests when making securities recommendations and to address any potential conflicts of interest we may have with respect to those recommendations.

#### **PART I**

##### **Our Brokerage Relationship With You.**

Ameriprise Financial Services, LLC ("Ameriprise Financial Services", "Ameriprise", or "we") is registered with the SEC as both an investment adviser and a broker-dealer. This means that we offer both brokerage and advisory products and services. This document focuses on the products and services Ameriprise Financial Services offers to retail clients through Ameriprise financial advisors in its capacity as a broker-dealer. We provide information to help you evaluate the benefits, risks, and costs of the investments and services we offer as part of a brokerage relationship and our approach to working together. We also provide information about the material conflicts of interest associated with recommendations we or our financial advisors make to our retail brokerage clients. We are required to eliminate or mitigate and disclose any such conflicts.

A brokerage relationship typically refers to a commission-based brokerage account and the investment products available within that account. However, you may also purchase commission-based products through an Ameriprise financial advisor that are not held in a brokerage account, such as Ameriprise certificates, variable insurance, and variable annuity products. In certain instances, you may hold investment products directly with the product sponsor, known as "direct at fund" or "direct at issuer positions." We refer to all of these products and services collectively as a brokerage relationship throughout this document.

##### **Best Interest Standard of Care.**

Our commitment to act in your best interest and not place our interests ahead of yours includes the following types of brokerage relationship recommendations:

- Individual securities transactions or a series of transactions; and
- Investment strategies involving securities including account type (managed or brokerage account).

When making any of these types of recommendations, your financial advisor must act in your best interest at the time the recommendation is made, taking into consideration your investment profile and other relevant factors, as well as the potential risks, rewards, and costs of reasonably available alternatives we offer.

##### **Overview of Products and Services We Offer.**

As you pursue your financial goals, it is important to understand the features, as well as the fees, costs, risks, benefits and other factors associated with the commission-based securities products and services you may purchase. While not all of the information included here will apply to your specific situation today, we encourage you to refer to this document (or any updated version that has been provided or made available to you) whenever you purchase new products or services through a brokerage relationship, so that you have the information you need to make an informed decision. You may access the most current version of this document at [ameriprise.com/bestinterest](http://ameriprise.com/bestinterest).

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Before opening a brokerage account or purchasing commission-based securities products, it is important that you understand and consider all fees, expenses, and other charges. Specific information concerning the account and transaction fees, and other charges of the account types we offer, is available in: (i) the Ameriprise Brokerage Client Agreement; (ii) the Other Important Brokerage Disclosures document which covers key disclosures; and (iii) the Ameriprise Financial Schedule of Account and Service Fees, all of which are available at [ameriprise.com/disclosures](http://ameriprise.com/disclosures).

Your financial advisor may voluntarily review your brokerage account to determine whether to make a recommendation to you; however, your brokerage relationship does not include account or investment monitoring.

For each investment strategy or investment product you choose for your account, please also be sure to review all pertinent sales literature, prospectuses, account agreements, policies, contracts, and other offering documents (collectively, "Offering Materials"), all of which are available from your financial advisor, before making an investment decision. Consider carefully all risks and other factors explained in the Offering Materials and remember - while investing for the future is the goal, investing has some degree of risk, and it is possible to lose money on any investment.

Investment products typically also include underlying fees ("Investment Costs"). These may include sales charges, investment management fees, servicing or distribution fees, and other fees that are charged by the investment product's sponsor or investment manager. These costs are in addition to the transaction-based fees that you pay directly from your brokerage account. They are paid indirectly by you through the assets of the investment product, for example as a shareholder in a mutual fund. Investment Costs reduce the value of your investment in the product and reduce the investment performance of your account.

In the remaining paragraphs of this section we provide an overview of the types of products and services our financial advisors may recommend to you, along with the types and general ranges of the fees and costs associated with each. **These fees and costs may increase or change over time and are provided as of the date of this document.** The specific types of Investment Costs associated with an investment product are disclosed in the applicable Offering Materials for each product. Please review all applicable information carefully before you make an investment decision and contact your financial advisor if you have questions about the types of fees and costs that are associated with your account and the specific investment products you hold.

#### *Fees, Costs, and Considerations Relating to Your Brokerage Relationship and Money Settlement Option.*

Ameriprise brokerage accounts feature a commission-based fee structure where you typically pay point-in-time transaction-based fees such as commissions, sales credits, sales charges, and order handling fees when you purchase or sell an investment product in your account. The total cost to you in a brokerage account will include: (i) all transaction-based fees; (ii) Investment Costs; and (iii) recurring account maintenance fees such as an annual custodial fee that may be charged in an account that is part of a tax-qualified plan and other incidental account fees as described in the Ameriprise Financial Schedule of Account and Service Fees. Investment Costs are discussed in more detail below.

Brokerage accounts enable you to invest in many different types of investment products including mutual funds, stocks, bonds, exchange-traded products, unit investment trusts, annuities, and alternative investments.

This document is limited to describing important information regarding a brokerage relationship with us. There are circumstances where you may benefit from a managed account or both a managed account and a brokerage account for different portions of your investment portfolio. Information regarding Ameriprise managed accounts can be found in the Ameriprise Managed Accounts Client Disclosure Brochure available at [ameriprise.com/disclosures](http://ameriprise.com/disclosures).

You should also review the **money settlement option** available for your brokerage account. A money settlement option is a feature offered by Ameriprise Financial Services 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 check-writing 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.

Money settlement options available through Ameriprise Financial Services 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 Services in its capacity as a broker-dealer, and services are provided by our affiliated clearing agent, American Enterprise Investment Services ("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 uninvested cash to AIMMA, our available multi-bank sweep program, AEIS receives and retains compensation from the participant banks based on your cash balance. This compensation is negotiated between each Federal Deposit Insurance Corporation ("FDIC") member bank ("Program Bank") and AEIS, or between the Program Bank and our vendor, IntraFi LLC, and is based on a benchmark interest rate, such as the Federal Funds Rate, plus or minus a spread. You can find up-to-date information on the revenue AEIS receives from unaffiliated Program Banks participating in AIMMA at [ameriprise.com/products/cash-cards-lending](http://ameriprise.com/products/cash-cards-lending). 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. The banks participating in AIMMA 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 AIMMA. This difference is known as the "spread." 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, as defined in the "*Third Party Payments and Cost Reimbursement Payments Received by AEIS*" section of this document, of up to 0.37% 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.

More detail 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).

**Periodic Fees:** Periodic fees include individual retirement account ("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).

Ameriprise Financial Services offers programs that may result in reimbursement to client accounts for certain periodic fees. In our client loyalty program, Ameriprise Achiever Circle Elite, participants are eligible for reimbursement of certain fees. In another program available for Ameriprise brokerage clients, Ameriprise financial advisors may receive funds from Ameriprise Financial Services based on the financial advisor's prior-year compensation, and are permitted to use the funds to reimburse client brokerage accounts for periodic fees. Not all financial advisors participate in the latter program, and it is possible that not all fees you incur may be eligible for reimbursement.

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

*Fees, Costs and Considerations Relating to Investment Products Held in Your Commission-Based Account.*

Ameriprise Financial Services offers a broad range of investment products, which are described in the Client Relationship Guide available at [ameriprise.com/customer-service/client-relationship-guide/](http://ameriprise.com/customer-service/client-relationship-guide/). Investment products available within a brokerage relationship are listed below, along with a summary of the fees and costs you can expect to pay as a retail brokerage client. Commissions, sales charges, sales credits, and sales loads shown, are based on the value of the investment product purchased or sold. Ongoing costs do not include any Investment Costs charged by the investment product and are based on the amount of your investment over time on an annualized basis, unless otherwise indicated.

Generally, trades within a brokerage account will incur a \$6 order handling fee, which is not shared with your financial advisor and covers costs associated with processing the order. Ameriprise Financial Services and our affiliates receive compensation, in addition to the fees and costs you pay directly from your account, as described in the "*Overview of Compensation Received by our Firm and our Affiliates*" section.

**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 \$50 to generally in the range of 2% to 3% of principal but may be greater under certain circumstances such as lower balance trades however commissions for such trades are capped at 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.

**Fixed Income Securities and Brokered Certificates of Deposit ("CDs"):** When you purchase or sell fixed income securities or CDs 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 CDs and fixed income securities range from a minimum of \$25 to generally in the range of 0.20% to 3.00% of principal but typically no greater than 3.00% of principal and may be negotiable with your financial advisor based on services provided. For new issue CDs, you do not pay a sales credit or commission.

**Mutual Funds:** Mutual funds come in a variety of share classes with differing expense structures. In a brokerage account, mutual funds offered by Ameriprise Financial Services most commonly are Class A or Class C shares. For Class A shares you will pay a "front-end" sales charge of generally up to 5.75%, which may be reduced when making larger purchases. For Class C shares and Class A shares purchased at NAV, you may pay a contingent deferred sales charge. For both Class A and Class C shares, you will pay 12b-1 fees as ongoing expenses. These sales charges and 12b-1 fees are shared between Ameriprise and your financial advisor.

The table below provides an overview of general fee ranges and annual operating costs associated with the various share classes. Class A, Class C, and in limited circumstances Class M shares are the only share classes offered in a brokerage account, although other share classes can be held in a brokerage account, including share classes of mutual funds that do not meet our due diligence standards or are otherwise not eligible to be purchased or held in a managed account. You can find more information on sales charges, operating expenses and other costs involved in purchasing and owning mutual funds through Ameriprise, including the factors that may influence what mutual funds your Ameriprise financial advisor recommends to you by visiting our website at [ameriprise.com/funds](http://ameriprise.com/funds) and clicking on "An investor's guide to purchasing mutual funds and 529 plans through Ameriprise Financial".

Share Class	A	C	M
Maximum sales charge range for equity funds	2.75%- 5.75% Average: 5.47%	N/A	3.50%
Maximum sales charge range for fixed income funds	1.00%-5.50% Average: 3.68%	N/A	2.75%-4.00% Average: 3.90%
Maximum sales charge range for short term fixed income funds	0.00%-5.75% Average: 2.10%	N/A	2.75%
Maximum contingent deferred sales charge imposed on redemptions	1.00% <sup>1</sup>	1.00% <sup>2</sup>	0.25% <sup>1</sup>
Annual 12b-1 fees	0.00% - 0.35% Average 0.24%	0.50% - 1.00% Average 0.96%	0.25% - 0.50% Average 0.44%
Total annual operating expense ranges	0.41%-8.06%	0.92%-8.81%	0.55%-1.55%
Average total annual operating expenses for equity funds	1.18%	1.93%	1.28%
Average total annual operating expenses for fixed income funds	0.91%	1.62%	0.86%
Average total annual operating expenses for short term fixed income funds	0.71%	1.41%	0.58%

<sup>1</sup>Class A & M shares acquired through large net asset value purchases with waived sales charges may incur a contingent deferred sales charge when the shares are sold within a defined time period as outlined in the prospectus.

<sup>2</sup>Class C shares may incur a contingent deferred sales charge when the shares are sold within a defined time period as outlined in the prospectus.

**529 Plans:** You will pay plan level annual maintenance fees for 529 plans from \$0 to \$25 annually. Investments in 529 plans are generally either in Class A or Class C shares. The maximum sales charge for Class A shares generally ranges from 2.5% to 5.75%, with a distribution or marketing fee between 0% to 0.25%, but generally is set at 0.25%. Class C shares do not have a front-end sales charge and their distribution or marketing fee generally ranges from 0.50% and 1.00%. These sales charges and distribution or marketing fees are shared between Ameriprise Financial and your financial advisor. Total average annual expenses for plans offering Class A shares generally range from 0.59% to 1.19% and for plans offering Class C shares generally range from 0.83% to 1.94%. There is no order handling fee for 529 plans.

**Unit Investment Trusts ("UITs"):** When you purchase UITs through a brokerage account you will pay a deferred sales charge, generally in the range of 1.85% to 3.50%, depending on the length of the term of the trust. The sales charge includes a creation and development fee of 0.5%. UITs may also be subject to Investment Costs, such as portfolio monitoring, bookkeeping, administration and other operating expenses. These expenses generally range from 0.45%-1.87%.

**Structured Products:** Structured products are bundled investments, often designed to provide some principal protection with market exposure. Structured products can be in the form of structured CDs, principal protected structured notes, and structured notes without principal protection. When you purchase or sell structured products in a brokerage account, you will pay a sales charge or commission which varies depending on the complexity and tenure of the security and ranges from a minimum of \$0 to generally in the range of 0.75% to 3% of principal.

**Alternative Investments:** Ameriprise Financial Services offers a wide range of non-traditional investment solutions that can complement your investment portfolio, including non-traded real estate investment trusts ("non-traded REITs"), non-traded business development companies ("non-traded BDCs"), non-traded closed-end funds ("non-traded CEFs"), hedge fund offerings, managed futures funds ("managed futures"), private equity offerings, real estate private placement funds, tax-deferred real estate exchanges ("1031 exchanges"), and exchange funds. The fee structure varies for each solution, please review the applicable Offering Materials carefully to understand each investment's cost structure and Investment Costs. Generally, when you purchase an alternative investment in a brokerage account, you will pay a sales charge or placement fee at the time you purchase your investment. Such fees may be negotiable with your financial advisor. In addition, ongoing management fees and servicing or distribution fees may be paid on an ongoing basis or for a period of time. The table below shows a general representation of the fees associated with our current offerings:

Alternative Investment Product	Maximum Sales Charge or Placement Fee	Ongoing Management Fee <sup>5</sup>	Shareholder Servicing, Distribution Fees <sup>4</sup>
Non-traded REITs	3.50%	0.75%-1.25%	0.85% <sup>1</sup>
Non-traded BDCs	3.50%	1.25%	0.85% <sup>1</sup>
Non-traded CEFs	3.50%	1.00%-1.25%	0.50%-0.85% <sup>1</sup>
Hedge Funds	3.00%	1.00%-2.00%	0.00-0.75%
Managed Futures	2.00%	2.00%	0.00-0.75%
Exchange Funds	1.50%	0.10%-0.70%	0.25%
Real Estate Private Placements	4.50%	2.00%	0.85% <sup>1</sup>
1031 Exchange Offerings	6.25%	0.05%-1.10%	0.85% <sup>1</sup>
Private Equity	2.00% <sup>2</sup>	0.75%-2.00% <sup>3</sup>	0.00%-0.70%

<sup>1</sup>Shareholder servicing and distribution fees may be subject to a cap.

<sup>2</sup>Many private equity offerings have a capital call or draw down structure. Drawdown structures do not have sales charges.

<sup>3</sup>May be based on committed capital.

<sup>4</sup>Time period of fees will vary depending upon the investment product purchased

<sup>5</sup>Some investment products also charge incentive or performance fees on fund profits, typically subject to a high water mark or a specified minimum return threshold, as disclosed in the product's Offering Materials.

**Ameriprise® Certificates:** When you purchase or sell Ameriprise Certificates, you will not pay a commission on the purchase or sale and there are no ongoing costs, however, withdrawals of principal made in the middle of a term are typically subject to a 2% early withdrawal penalty. The Ameriprise Cash Reserve Certificate does not have any withdrawal penalties. There is no order handling fee for Ameriprise Certificates. Currently, Ameriprise Certificates can be purchased or sold only through Ameriprise Financial Services. If you choose to terminate your brokerage relationship, you may continue to hold them (without any fees), redeem them at any time (paying any applicable early-redemption penalty) or hold them until the penalty-free term ends.

**Variable Annuity, Registered Index Linked Annuity (also known as structured annuities or index linked annuities) and Variable Insurance Products:** Ameriprise Financial Services has selling arrangements with a range of annuity and insurance providers, including with RiverSource and RiverSource Distributors, to distribute these products to retail brokerage clients. We have relationships with both affiliated and third-party manufacturers of insurance and annuities to provide clients with choice. RiverSource Distributors, Inc. ("RiverSource Distributors") is a registered broker-dealer, serving as principal underwriter and distributor of variable life insurance and variable annuities on behalf of RiverSource Life Insurance Company and its wholly owned subsidiary, RiverSource Life Insurance Co. of New York (together "RiverSource").

A time of sale commission generally in the range of up to 7% but no greater than 7.5% of your cost for the investment product to you is payable to your financial advisor for all variable annuity contract sales regardless of whether you purchase a RiverSource or unaffiliated insurance company variable annuity product. This commission is not a fee paid by you but rather by us from compensation we receive from the product manufacturer. For variable and structured annuities, financial advisors may choose to receive the total commission at time of sale or may choose to receive a partial commission at time of sale and ongoing trail compensation. In both cases their total compensation received is comparable.

**Variable Annuities and Registered Index Linked Annuities:** Annuities are intended to be long-term investing vehicles for your retirement and may provide certain guarantees, such as death benefit and income guarantees. You will pay an additional fee for optional death benefit, income, and accumulation guarantees typically offered through riders that may be available in the contract you purchase. All annuity guarantees are based on the continued claims-paying ability of the issuing insurance company. Non-qualified annuities generally grow tax-deferred, meaning you will not pay taxes on your earnings until you withdraw them.

The types of annuities that your Ameriprise financial advisor may offer to you as part of your brokerage relationship are:

- **Variable annuities**, which offer growth potential through (i) allocations to the variable subaccounts; (ii) fixed account options that include the ability to earn fixed rate(s) of interest; and/ or (iii) interest linked to an index. Variable annuities typically offer optional riders and you will pay an additional fee for options such as income, accumulation, or death benefit guarantees. The guarantees offered by variable annuities do not apply to the performance of the variable subaccounts, which will vary with market conditions.
- **Registered index linked annuities** offer growth potential based upon the performance of a specific index or through a fixed account option. The growth potential is limited by the terms of the associated measurement method, such as a cap or participation rate. With a registered index linked annuity, you are not invested directly in any index. This product type typically provides partial protection against loss through the use of downside protection options such as buffers and floors. Generally, allocation options with greater downside protection provide less upside potential. Registered index linked annuities typically offer optional riders and you will pay an additional fee for options such as income, accumulation, or death benefit guarantees.

You may pay a surrender (withdrawal) charge on a full or partial withdrawal from a variable or registered index linked annuity during the surrender charge period. The surrender charges typically decrease over the surrender charge period. Alternatively, some contracts offer withdrawal provisions which allow you to withdraw portions of your money without surrender charges. If you take a full or partial withdrawal prior to the end of your selected strategy on a registered index linked annuity, you may be subject to an interim value calculation that could negatively impact your contract value.

There are no sales charges on variable or registered index linked annuities. Periodic fees and expenses will vary depending upon the annuity product purchased. You may pay mortality, expense and administrative fees, contract administration charges, or additional fees for optional features or benefits such as index strategies or annuity contract riders. For variable annuities or registered index linked annuities that offer subaccounts you indirectly pay Investment Costs charged by the underlying fund when you choose subaccounts that invest in underlying funds. Keep in mind that the funds available through a variable annuity or registered index linked annuity product are not publicly traded retail mutual funds. The table below provides general fee and operating expenses associated with the various variable annuities and registered index linked annuities we offer.

Product Type	Surrender Charge	Mortality, expense, administration and distribution fees or base contract fee <sup>1</sup>	Contract administrative charges <sup>2</sup>	Optional riders <sup>4</sup>	Investment Costs of underlying funds (net)	No cap index options with annual fee <sup>3,5</sup>
Variable annuities	0, 5,7 and 10 yrs.	0.75% - 1.55%	\$0 - \$50	0.10% - 1.80%	0.26% - 2.37%	NA
Registered index linked annuities	3 and 6 yrs.	0% - 1.25%	\$0 - \$50	0% - 1.50%	0% - 0.87%	0.05% - 4.00%

<sup>1</sup>Fee may be lower if purchase payments or annuity contract value exceeds a certain dollar amount. Group variable annuities may be available that offer a lower mortality, expense, administration, and distribution fees.

<sup>2</sup>Administrative fees may be lower or waived if annuity contract value exceeds a certain dollar amount. RiverSource reserves the right to increase the Administrative fee to a maximum of \$80.

<sup>3</sup>Varies by option and time of selection.

<sup>4</sup>Varies based on the type of rider selected.

<sup>5</sup>The annual fee will vary by segment length, investment strategy, type and surrender charge term elected. The annual fee is multiplied by the number of years and will be deducted at the end of the segment.

**Variable Universal Life Insurance ("VUL"):** Permanent life insurance can provide lifetime death benefit protection when properly funded. VUL policies may also offer options for tax-deferred cash-value growth by allocating portions of your premiums to variable investment options that invest in underlying funds. Such payments may also be directed to indexed accounts and fixed rate accounts. Funds allocated to variable investment options will fluctuate in value, depending on their investment performance, whereas funds allocated to indexed accounts will earn interest based on the performance of an index. Any life insurance guarantees are based on the continued claims-paying ability of the issuing insurance company.

A sales charge is deducted from each premium you pay, with net premiums allocated to your investment options according to your premium allocation instructions. Policy values may increase or decrease based on the performance of the variable investment option and the amount of interest credited from indexed and fixed rate accounts.

Fees and costs are deducted from the policy value periodically and vary depending on the VUL product purchased. Some fees and costs are fixed, while others vary depending on factors such as age, rating class, gender, and policy year. Fee and cost rates may change from time-to-time as determined by the insurer, subject to maximum guaranteed rates stated in the policy.

Examples of fees and costs that you may pay include premium charges, cost of insurance, mortality, expense and administrative fees, contract administration fees, or additional fees for optional features or benefits, called riders. You indirectly pay Investment Costs charged by the underlying fund when you choose variable investment options that invest in underlying funds. Keep in mind that the funds available through a variable life insurance product are not publicly traded retail mutual funds. A surrender (withdrawal) charge may be deducted from policy values if you surrender all or part of the policy or if the policy lapses during a specified period of time (e.g., 10 or 15 years after purchase or increase in the coverage amount).

The table below provides general fee ranges and operating costs associated with the VUL policies we offer. Note, however, carrier fees and expenses are generally lower than the maximum fees and expenses reflected below.

Sales Charge <sup>1</sup>	Surrender Charge	Cost of Insurance	Mortality and expense fees	Administrative and distribution fees and contract administrative charges <sup>1</sup>	Optional riders <sup>1</sup>	Investment Costs of underlying funds (net) <sup>2</sup>
Minimum of 2% to generally in the amount of 6-7% of premium amount but no greater than 30%, deducted when premiums are paid.	\$0.03 up to \$57.96 per \$1,000 of initial specified amount for a period of 9-19 years for most products if you fully surrender your policy. Some products may impose up to a 100% surrender charge of first year sales load target premium (excluding riders and extras) in the early contract years.	\$0.00 to \$83.34 monthly, per \$1,000 of net amount at risk.	Daily mortality and expense risk charges at an annual rate of 0.0% to 1.26% as a percentage of assets in variable investment options.	\$0.01 to \$12.60 monthly per \$1,000 of basic or initial specified insurance amount plus \$8 to \$30 monthly contract administration charge.	Optional rider fees vary greatly. Some riders have no associated fees, some may be charged based on per \$1,000 of insurance amount, and others may be charged based on percentage of policy value. Some riders may not have fees until exercised.	Generally in the amount of 0.08%-2.50% but no greater than 13.23%.

<sup>1</sup>Fee may be lowered or in some instances removed after the insurance policy is held for a defined period of time.

<sup>2</sup>Some indexed account options associated with VUL policies may have an asset-based charge for any cash value held in those accounts within the policy of up to maximum 2.0% of the accumulation value invested in indexed account options.

**Securities-based Lending Solutions:** The types of securities-based lending solutions that are made available to retail brokerage clients of Ameriprise Financial Services are outlined below. Both pledge loans and margin are available on non-qualified accounts; however, you may not utilize both margin lending features and a pledge line of credit on the same account.

- **Margin Loans:** Margin lending is credit extended directly by AEIS and may be used for liquidity purposes but also provides the ability to borrow money to purchase securities. When you trade securities on margin or withdraw funds, AEIS extends a line of credit to you, using the securities in your investment account as collateral. If you have an account with margin lending capabilities, you will pay monthly interest on any outstanding margin loan balance. Interest rates are variable and can change without notice. Margin interest rates follow the defined rate structure outlined within the Margin Agreement contained within the Brokerage Client Agreement and may be negotiable based on size of the margin loan. For more information on negotiated rates, please contact your financial advisor. For current margin rates, please see our Brokerage Account and Custodial Fees available at [ameriprise.com/financial-planning/our-fees/brokerage-accounts-custodial-fees](http://ameriprise.com/financial-planning/our-fees/brokerage-accounts-custodial-fees). The interest fees you pay are retained by AEIS and not shared with your financial advisor.
- **Pledge Line of Credit:** Ameriprise Financial Services may allow you to pledge non-qualified account assets as collateral for an Ameriprise Preferred Line of Credit or an Ameriprise Preferred Loan offered jointly and separately by Ameriprise Bank and Goldman Sachs Bank USA or a pledge line of credit program from a third-party financial institution. While a pledge line of credit or loan such as the Ameriprise Preferred Line of Credit or Ameriprise Preferred Loan is extended by a financial institution, such lines of credit are principally used for liquidity purposes only. If you have a pledge line of credit or loan, where your Ameriprise account assets are used as collateral for a line of credit or a loan, you will pay interest on any outstanding loan balance. The interest rates and any fees are determined by, and paid directly to, the financial institution issuing the loan and are not shared with your financial advisor. The interest rate you may secure from a third-party financial institution may be higher or lower than the interest rate offered for an Ameriprise Preferred Line of Credit or an Ameriprise Preferred Loan.

### **Overview of Compensation Received by Financial Advisors.**

For commission-based securities products, commissions, sales charges, sales credits, and sales loads described above are paid by you and shared with your financial advisor, unless otherwise noted. Ameriprise Financial Services receives compensation in addition to the transaction-based fees and costs listed above, such as dealer concessions, selling commissions, and other payments, as described in the "Compensation Received by Ameriprise Financial Services" section below, and such compensation is typically shared with your financial advisor. The actual portion of these fees paid to your financial advisor depends 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 below and throughout the remaining sections of this document.

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

#### **Transaction-based Compensation**

The actual portion of commission-based fees paid to your financial advisor depends on the payout rate for which your financial advisor qualifies (the "advisor payout rate") and the amount of fees you pay.

- Independent contractor franchisees and independent contractors generally receive an advisor payout rate of 72% to 91%, and employee financial advisors generally receive 0% to 46%.

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 an advisor payout rate but may receive in the compensation form of a bonus based in part on revenue generated through your commission-based fees.
- 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 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, and whether the financial advisor was formerly associated with a firm acquired by Ameriprise Financial, Inc.

**Other Sources of Compensation**

Commissions payable to your financial advisor for RiverSource and unaffiliated variable insurance products vary by manufacturer and product. These commissions are not fees paid by you but rather by us from compensation we receive from the product manufacturer. The compensation for variable annuities, registered index linked annuities and VUL will vary depending on the specific type and size of the insurance or annuity product that you purchase, the insurer that issues the product, the total number of life insurance products sold by the financial advisor for that insurer, and other factors. This compensation typically will increase as the size of the insurance policy or annuity contract increases. Generally speaking, the compensation that the financial advisor will receive is calculated by a formula. If an unaffiliated annuity or insurance product is offered, the financial advisor is generally an appointed agent of the insurer and receives, indirectly, compensation from the unaffiliated insurer for the sale and service of that product.

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

Your financial advisor receives compensation related to your Ameriprise Bank Savings Account based on a fixed percentage of your average daily balance.

Your financial advisor receives compensation related to your Ameriprise Bank Certificate of Deposit based on a fixed percentage of your average daily balance.

Your financial advisor receives compensation when you open an Ameriprise Bank Checking Account provided you fund the account and maintain balance requirements.

Your financial advisor receives compensation for providing services related to your Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan based on an annualized fixed percentage of your average daily outstanding balance.

Your financial advisor receives compensation for performing certain activities associated with the Ameriprise Home Lending Program when your mortgage loan is purchased and serviced by Ameriprise Bank.

Your financial advisor receives referral fees when you purchase and maintain American Family Insurance insurance products under a long-term distribution agreement between Ameriprise Financial Services, American Family Mutual Insurance Company and American Family Connect Property and Casualty Insurance Company. American Family Insurance is not affiliated with Ameriprise Financial Services.

If Ameriprise Bank accepts a trust based upon a referral from your financial advisor, Ameriprise Financial Services receives a referral fee from Ameriprise Bank. A portion of this referral fee is shared with your financial advisor. The referral fee is paid by Ameriprise Bank from the fees earned for its services and is not an additional cost to the trust account.

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.

**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 servicing advisor may or may not be the financial advisor who has completed the required product training. A financial advisor who has not completed the required training may refer you 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 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 the 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 coaching of your financial advisor. The cost of the product or service you purchase is not affected.

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.

### **Overview of Compensation Received by our Firm and our Affiliates.**

Ameriprise Financial Services and its affiliates receive revenue from several different sources on the products and services you purchase. These sources include the fees and costs you pay, other arrangements we have in place with product companies, and investment and interest income. The revenue generated or received supports, in part, the development of new products, maintenance of our infrastructure, and retention of employees and financial advisors. The types of compensation we receive from product companies and other third parties related to our brokerage relationship recommendations are described below.

If we and our affiliates did not receive this compensation, we would likely charge higher fees or other costs to clients, for the services provided. When evaluating the fees and costs of the investment products we offer within a brokerage relationship, you should consider not just the transaction-based fee, but also the product-level fees and the total compensation that Ameriprise Financial Services and our affiliates receive.

### ***Third Party Payments and Cost Reimbursement Payments Received by AEIS.***

For the investment products listed below, a portion of the Investment Costs that you pay indirectly through the product's underlying fees, are subsequently received by our affiliated clearing agent, AEIS, from the product companies who manage, sponsor, or distribute the investment products we recommend and you select as part of your brokerage relationship. We refer to this compensation as "Third Party Payments" and it helps fund the cost of providing services, maintaining accounts, and offering an investment platform for our clients, as well as providing revenue and net earnings to AEIS.

AEIS performs certain services for the benefit of Ameriprise Financial Services, its financial advisors, and clients, including but not limited to, record keeping, administration and shareholder servicing support, applicable platform level eligibility and investment product due diligence, investment research, training and education, client telephonic and other servicing, and other support related functions, such as trading systems, asset allocation and performance reporting tools, and websites and mobile applications (collectively "Cost Reimbursement Services").

AEIS receives a variety of payments for Cost Reimbursement Services ("Cost Reimbursement Payments") from investment products sponsored or managed by affiliated investment advisers (e.g., Columbia Management Investment Advisers) and from unaffiliated investment product companies for investments you make as a result of our recommendations. These Cost Reimbursement Payments may include sub-transfer agency fees, networking fees, trail compensation, revenue sharing and marketing support payments that at times may exceed the costs of the Cost Reimbursement Services provided and such payments increase the gross revenues and net earnings of AEIS. Third Party Payments are generally funded from the Investment Costs associated with investment products you purchase. Investment Costs reduce your investment return. AEIS receives Cost Reimbursement Payments from product companies as shown in the following chart. These payments are not shared with your financial advisor.

Investment Product Type	Annual asset-based payment	Sales-based payment range
Mutual Funds of Full Partner firms <sup>1,2</sup>	Up to 0.20% <sup>3</sup>	N/A
Mutual Funds of Available for Sale firms <sup>4</sup>	Up to 0.10%	N/A
529 Plans of Full Partner firms <sup>1</sup>	Up to 0.18%	N/A
Actively Managed ETFs <sup>5</sup>	Up to 0.18%	N/A
UITs <sup>6</sup>	Volume concessions from 0.035% to 0.175% of total UIT sales (in either a calendar quarter or over a trailing 12-month period), and payments that range from 0.058% up to 0.084% annually based on projected UIT sales assuming growth rate each year over the three-year life of the contract. The total amount of these payments will not exceed 0.20% of total UIT sales.	
Structured Products	N/A	0.25%-0.60% for each year of the product's term, up to a maximum of 1.6%
Money market mutual funds	Up to 0.37%	N/A
Hedge funds and managed futures fund	Up to 0.25%	N/A
Private equity	Up to 0.75% <sup>7</sup>	Up to 1.50% <sup>7</sup>
Real estate private placements	Up to 0.25% <sup>7</sup>	Up to 2.50%
Non-traded REITs, non-traded CEFs, 1031 exchanges and non-traded BDCs	Up to 0.25%	Up to 1.50%
Variable Annuities and Registered Index Linked Annuities	Up to 0.18%	Up to 1.50%
Variable Universal Life Insurance ("VUL")	N/A	Up to 31.5% of target premium and up to 0.875% of any premiums paid above target

<sup>1</sup>These payments form a structure referred to as the Ameriprise Financial Mutual Fund Program ("Mutual Fund Full Participation Program") To be included in the Mutual Fund Full Participation Program, firms (each, a "Full Participation Firm") have agreed to pay AEIS a portion of the revenue generated from the sale and/or management of mutual fund shares. These firms provide marketing, educational and sales support payments to Ameriprise financial advisors and make cost reimbursement payments at a higher level than Available for Sale firms. The Mutual Fund Program does not include money market mutual funds

<sup>2</sup>Rather than determining the amount of the payment solely on an asset-based basis, American Funds pays AEIS an annual negotiated platform fee based on a number of factors, including prior year assets, in accordance with their prospectus governing each mutual fund. This platform fee will not exceed 0.20% of assets and will also not exceed the limits set forth in the prospectus governing each fund.

<sup>3</sup>In instances where a new Full Participation Firm relationship is established, in order to offset AEIS expenses for providing Cost Reimbursement Services, as defined below, in certain instances the cost reimbursement payments will initially be structured in the form of an annual flat fee in addition to 0.20% of assets invested, with the total dollar amount of such payment not to exceed \$1,250,000.

<sup>4</sup>Available for Sale Firms pay AEIS a portion of the revenue generated from the sale and/or management of mutual fund shares. These firms do not provide marketing or sales support and make payments to AEIS at a lower percentage rate than firms in the Mutual Fund Full Participation Program.

<sup>5</sup>For actively managed ETFs recommended on a solicited basis, AEIS receives from the ETF manager or distributor both (i) ongoing asset-based cost reimbursement payments of up to 0.18% of the assets invested in these products; and (ii) an annual flat program fee of up to \$400,000 per manager or distributor.

<sup>6</sup>AEIS also receives dealer concessions 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. Dealer concessions are shared with your financial advisor.

<sup>7</sup>Payments may be based on assets or capital commitments

**Payments for sales support:** Separately, for alternative investments and structured products, AEIS will receive marketing, educational and sales support payments in the form of an optional subscription for sales support for a fixed annual fee of up to \$250,000, which when combined with the payments described above for these types of investment products may exceed the ranges noted.

**Sub-transfer Agency Fees or Networking Fees:** AEIS will also receive sub-transfer agency fees or networking fees with respect to investments you make in mutual funds and 529 plans and certain alternative investments. Compensation for sub-transfer agency services generally ranges from \$6 to \$12 per position annually for networked accounts, and from \$16 to \$19 per position annually for omnibus accounts or, if paid on an asset basis, from 0.10% to 0.15% annually of any amounts you have invested in such mutual funds.

In the case of no-load fund families for which AEIS has a direct relationship, the compensation for sub-accounting, administrative and distribution support services may be bundled into one asset-based fee, generally of up to 0.35% (which may include up to a 0.25% service fee) annually of the value of such shares held in an account.

*Servicing, Account Maintenance, and Other Fees Received by AEIS.*

**Order Routing:** AEIS may from time to time receive payments for directing orders to certain market makers or broker-dealers. This is known as payment for order flow. We provide more detailed information within our Order Routing Report published quarterly on ameriprise.com.

**Margin Loans:** When you trade securities on margin, you are generally trading in securities that you would otherwise not be able to trade in your account. AEIS earns compensation in the form of interest on the margin balance, order handling charges, and other fees on investments purchased on borrowed funds. AEIS earns interest on your margin balance whether you use the money to purchase securities or for liquidity purposes.

**Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan:** Ameriprise Bank does not compensate AEIS, but reimburses AEIS for its direct out of pocket expenses related to its Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan support, and such payments are not shared with your financial advisor.

**Vendor Rebates:** AEIS also earns rebates from our shareholder materials delivery vendor (e.g., annual reports and proxies) based on the difference between the rate charged to the issuer and the cost to the vendor to deliver the shareholder materials. The rebates are generally higher for clients who consent to receiving materials electronically.

**Payments for Product Implementation and Trading Technology Expenses:** For most investment products, AEIS will receive payments of up to \$25,000 per investment product per expense from third-party firms to reimburse expenses associated with each of (i) conducting due diligence on the investment product; and (ii) the implementation of certain technology platforms or capabilities related to the distribution of the investment product.

#### *Compensation Received by Ameriprise Financial Services*

**Education, Training, Seminar Reimbursement, and Non-Cash Compensation:** Certain 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 sells annuity and insurance products to its clients manufactured by its affiliate, RiverSource, as well as from select unaffiliated insurance companies. Cost reimbursement payments for educational and sales support are received by Ameriprise Financial Services and/or its affiliate, AEIS, from RiverSource and unaffiliated insurance companies.

**Ameriprise® Certificates:** On your balances held in an Ameriprise Certificate, Ameriprise Certificate Company pays Ameriprise Financial Services a distribution fee of 0.10% on an annualized basis. Installment certificates pay a distribution fee to Ameriprise Financial Services of 0.25% of each payment into the installment certificate. A substantial portion of the distribution fee paid to Ameriprise Financial Services may be passed through to your financial advisor.

**New Issue Brokered CDs:** When you purchase a New Issue Brokered CD, Ameriprise Financial Services receives an upfront selling concession of between 0.00% and 3.50% of the amount of the CD from the issuing bank, including Ameriprise Bank when applicable, which is generally larger for New Issue CDs with longer terms. The selling concession is determined by the bank based on the difference between what Ameriprise Financial Services pays for the New Issue CD and the price of par to the client. This payment is passed through to your financial advisor.

**Exchange Funds:** Ameriprise Financial Services typically retains a placement agent fee of up to 1% of the value of the shares purchased for each exchange fund sold.

**Alternative Investment Products:** Ameriprise Financial Services receives selling commissions for the sale of alternative investment products. For non-traded CEFs Ameriprise Financial Services may receive fees of up to 6.0% of the amount invested and is shared with your financial advisor.

**Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan:** Ameriprise Bank, FSB earns revenue based on the outstanding balance amount of the Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan and the interest rate on the line or loan. Ameriprise Financial Services receives compensation from Ameriprise Bank, FSB of 0.25% of the outstanding balance on the credit line or loan on an annualized basis. This amount is shared with your financial advisor based on how your advisor is affiliated with us and on the payout rate for which your financial advisor qualifies. This compensation is separate from the compensation your financial advisor receives for servicing your account.

**Ameriprise Bank Savings Account and CDs.** Ameriprise Financial Services receives compensation from Ameriprise Bank of 0.05% of the average monthly balance, on an annualized basis. 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

**Distribution Access Fees:** Ameriprise Financial Services directs securities purchase and sale transactions through our affiliate, AEIS, on a fully disclosed basis. In exchange, Ameriprise Financial Services receives reimbursements from AEIS for our non-distribution related expenses.

**Referrals to Structured Settlements Agents:** 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.

**Underwriters' Compensation:** Ameriprise Financial Services receives a fee comprised of a selling credit (commission) paid by the issuer, a management fee, an underwriting fee, and, in some cases, a structuring fee, for the sale of initial public offerings ("IPOs"), such as closed-end funds and preferred securities where it acts as underwriter. Where Ameriprise Financial Services acts as only a selling agent for new issues it is limited to a selling credit paid by the issuer. The specific amounts vary by each individual offering and are disclosed in the prospectus of the specific offering.

The types of compensation we receive, and our total compensation, is described in more detail in the "**Revenue Sources for Other Ameriprise Financial, Inc. Companies**" section of the Client Relationship Guide available at [ameriprise.com/customer-service/client-relationship-guide/](http://ameriprise.com/customer-service/client-relationship-guide/).

### *Compensation Received by Other Affiliates.*

Third Party Payments do not include any management fees, distribution fees, or compensation earned related to administrative or transfer agency fees related to proprietary mutual funds held in your Account and managed by one of our affiliates, such as Columbia Management Investment Advisers, LLC, a wholly-owned subsidiary of Ameriprise Financial, Inc., Ameriprise Financial Services' parent company. These fees are included in the Investment Costs paid indirectly by you and are received by our affiliates but are not compensation to Ameriprise Financial Services or AEIS, however they are an economic benefit to Ameriprise Financial Services and its affiliates as further discussed in the "**Economic Benefits of Affiliates' Products and Services**" section of the Client Relationship Guide available at [ameriprise.com/customer-service/client-relationship-guide/](http://ameriprise.com/customer-service/client-relationship-guide/).

Investment Costs apply whether the investment product is sponsored or managed by an unaffiliated third party or by an affiliate of Ameriprise Financial Services, such as CMIA. When you invest in investment products managed by CMIA, CMIA or its affiliates will receive compensation for managing those investments and for other services they provide based on the amount you invest, just as they would if you invested in CMIA investment products through another service provider

### **Scope of Services**

Note that your financial advisor is not permitted to have discretion over brokerage account assets.

**Commercial Paper** is traditionally short-term (<9 months) corporate debt offering that can be either registered or unregistered. Certain financial advisors in the AFIG channel offer commercial paper. Eligibility to purchase commercial paper is restricted and varies based on the specific offering. Commercial paper is not available to general investors, and qualification as a Qualified Institutional Buyer (QIB), accredited investor, qualified purchaser or other qualification requirements may apply

In limited instances, your Ameriprise financial advisor holds a limited license as an Investment Company and Variable Contracts Products representative and may only solicit the purchase or sale of the following investment products: mutual funds, closed-end funds on the initial offering only, variable annuities, variable life insurance, unit investment trusts, Ameriprise certificates, and municipal fund securities (e.g., 529 savings plans). You will be notified if your financial advisor holds this limited license. If you are interested in a broader range of investment products, such as equities, bonds, options, exchange-traded funds and alternative investments such as private placement offerings, your financial advisor can direct you to other Ameriprise financial advisors to support those needs

You will be notified if the financial professional you are working with is one of a limited number of Financial Consultants who is licensed to offer brokerage products and services but cannot recommend or service our investment advisory programs, including comprehensive financial planning. You may receive sales literature, client agreements, disclosures, and other documents that use the term Financial Advisor even if the professional you work with is a Financial Consultant rather than a Financial Advisor. If you are interested in receiving investment advisory services, your Financial Consultant can direct you to an Ameriprise Financial Advisor to support those needs

## **PART II**

### **Material Conflicts of Interest.**

As with all business models, there may be circumstances where Ameriprise Financial Services or your financial advisor has a conflict of interest that a reasonable person would conclude could create an incentive for the firm or the financial advisor to place our interests ahead of yours and this incentive might affect the exercise of either's best judgment in rendering advice to you. Notwithstanding such potential conflicts of interest, Ameriprise financial advisors are required to make securities recommendations within brokerage accounts, as well as the additional types of brokerage relationship recommendations listed in the "Best Interest Standard of Care" section, in their clients' best interests. In other words, your financial advisor must have a reasonable basis to believe that a recommendation is in your best interest at the time they make that recommendation to you, taking into consideration cost and the reasonably available securities investments and accounts we offer. Financial advisors receive extensive training designed to support them in making best interest recommendations.

Ameriprise Financial Services is a diversified financial services firm. We provide access to financial planning, investment products, and services - which includes wealth management, asset management, insurance, and annuities. It is important to understand how Ameriprise Financial Services and our affiliates earn revenue and the manner in which your financial advisor is compensated may create a potential conflict of interest. Below we provide information about the most common, or material, conflicts of interest, associated with recommendations we or our financial advisors make to our retail brokerage clients.

We have long had a robust ongoing process for identifying and addressing any conflicts of interest. Ameriprise Financial Services has adopted policies and procedures reasonably designed to identify conflicts, and has implemented appropriate controls to either eliminate, or mitigate and disclose our conflicts of interest related to the firm's and our financial advisors' services, fees and compensation. We address conflicts of interest not completely eliminated through a combination of disclosures and policies and procedures, as well as supervision and surveillance of accounts.

#### *Conflicts of Interest Related to our Affiliated Products and Services*

Ameriprise Financial Services and its affiliates generally receive more revenue from sales of affiliated investment products. Employee compensation and operating goals at all levels of our firm are tied to the company's success. Certain employees may receive higher compensation and other benefits based, in part, on assets invested in affiliated mutual funds. When financial advisors recommend products manufactured or offered by our affiliates, we and our affiliates receive more compensation and revenue overall as an enterprise. A listing of our affiliates may be found in the "**Other Financial Industry Activities and Affiliations**" section of the Client Relationship Guide available at [ameriprise.com/customer-service/client-relationship-guide/](http://ameriprise.com/customer-service/client-relationship-guide/).

**Columbia Management Investment Advisers, LLC ("CMIA"):** Investment Costs received by CMIA are not direct compensation to Ameriprise Financial Services, however, Ameriprise Financial Services, CMIA, and their affiliates receive more revenue, in aggregate, from the purchase of affiliated investment products offered by CMIA, than from the purchase of unaffiliated investment products. Therefore, it is more profitable for Ameriprise Financial Services' parent company when you purchase or own a CMIA investment product in your account.

Ameriprise Financial, Inc. may receive compensation related to your CMIA mutual fund, alternative investment, and ETF holdings either through payments from service providers to the mutual funds or indirectly through compensation received by affiliated entities such as: CMIA and Columbia Wanger Asset Management, LLC, both of which provide investment management services and administrative services to the Columbia Funds;

Columbia Management Investment Distributors, Inc., which provides distribution services for the Columbia Funds; and Columbia Management Investment Services Corp., which provides transfer agency services to the Columbia Funds. See the "**Economic Benefits of Affiliates' Products and Services**" section of the Client Relationship Guide available at [ameriprise.com/customer-service/client-relationship-guide/](http://ameriprise.com/customer-service/client-relationship-guide/) and/or the applicable Offering Materials for a description of the various revenues earned by our affiliates.

**Sweep Program and Affiliate Compensation:** Sweep Programs made available in accounts are offered by Ameriprise Financial Services in its capacity as a broker-dealer, and services are provided by our affiliate, 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. Ameriprise Financial Services determines you Sweep Program and your financial advisor does not have the ability to recommend a different Sweep Program. Revenues received by our affiliates related to the Sweep Programs are not shared with your financial advisor.

Generally, the combined revenue earned by our affiliates, AEIS and Ameriprise Bank, is expected to be: (i) the highest when your account sweeps cash into AIMMA where Ameriprise Bank is utilized as a Program Bank; (ii) the second highest when your account sweeps cash into AIMMA where unaffiliated Program Banks are utilized; and (iii) the lowest when your account sweeps cash into an eligible money market mutual fund. Our affiliates AEIS and Ameriprise Bank use this revenue to defray the cost of operating our Sweep Programs and the expense of providing other services to our clients, as well as for general operating expenses and to provide net earnings to AEIS and Ameriprise Bank. In the absence of this revenue Ameriprise Financial Services would likely charge higher fees or other charges to clients for the services AEIS and Ameriprise Bank provide to clients.

Ameriprise Financial Services addresses this conflict of interest through a combination of disclosures and policies and procedures regarding Sweep Program availability and the free-credit balance.

**RiverSource Distributors and RiverSource:** As noted in Part I, Ameriprise Financial Services has selling arrangements with RiverSource and RiverSource Distributors to distribute RiverSource annuity and insurance products. Investment Costs and the Cost Reimbursement Payments received by RiverSource Life Insurance Company and RiverSource Life Insurance Co. of New York (together referred to as RiverSource) are not direct compensation to Ameriprise Financial Services, however, Ameriprise Financial Services, RiverSource and their affiliates receive more revenue, in aggregate, from the purchase of affiliated investment products offered by RiverSource than from the purchase of unaffiliated insurance products and therefore it is more profitable for Ameriprise Financial Services' parent company when you purchase or own a RiverSource product. RiverSource variable annuity and variable insurance products include subaccounts or other investments that are manufactured or offered by our affiliate CMIA, which can comprise up to 100% of your subaccount allocations. CMIA receives more revenue, in aggregate, and it is more profitable for Ameriprise Financial Services' parent company, when your RiverSource variable annuity subaccounts are allocated to investment products advised or sub-advised by CMIA. Additionally, Ameriprise financial advisors have access to model portfolios intended for use in constructing RiverSource variable annuity subaccount allocations. The model portfolios are created by both affiliated and unaffiliated model providers and can be comprised of up to 100% in investments that are manufactured or offered by our affiliate CMIA. Therefore, the model portfolios favor CMIA investment products. Additionally, model providers may also make Cost Reimbursement Payments to our affiliates RiverSource Distributors and AEIS for the investment products contained in the model portfolios. Ameriprise Financial Services indirectly benefits from these payments as they enhance the overall profitability of our parent company.

RiverSource reimburses Ameriprise Financial Services or AEIS, and these entities may subsequently reimburse Ameriprise financial advisors, for client/prospect educational events and financial advisor sales meetings, seminars and training events consistent with Ameriprise Financial Services and AEIS policies, as applicable. Other unaffiliated insurance companies may be permitted to provide similar educational and sales support in accordance with our policies.

Unaffiliated insurance companies that issue annuities and insurance do not provide direct client or financial advisor education or sales support, other than product training materials, product sales literature and addressing client service issues. As a result, Ameriprise financial advisors likely have a greater familiarity with RiverSource insurance and annuity products, as well as with any unaffiliated insurance companies who provide added educational support.

**Ameriprise Certificates:** Ameriprise Financial Services offers certificates issued by our affiliate, Ameriprise Certificate Company. CMIA provides investment management services to Ameriprise Certificate Company for a fee and Columbia Management Investment Services Corp. receives certain fees and expenses paid from Ameriprise Certificate Company in exchange for the transfer agent services it provides. Ameriprise Financial Services receives fees from Ameriprise Certificate Company in exchange for distribution services. Ameriprise Certificate Company earns spread revenue on the difference between the returns it earns on the investments that support its product obligations and the amount that it pays certificate holders.

**Securities-based Lending Solutions:** When AEIS charges you interest on your margin balance it retains the full amount of such revenue. When Ameriprise Bank, FSB as co-lender receives revenue related to your Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan, each of Ameriprise Bank, FSB and Goldman Sachs Bank USA receives a pro-rata portion of the revenue generated. As a result, on a comparable amount of credit extended, Ameriprise Financial Services and its affiliates generally earn higher revenues for the use of margin and it is therefore more profitable when clients utilize margin than when using an Ameriprise Preferred Line of Credit or Ameriprise Preferred Loan. Ameriprise Financial manages this conflict of interest by keeping the cost to you for either a negotiated rate margin loan or an Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan comparable and in line with each other by monitoring interest rates, and through the implementation and maintenance of policies, procedures, training and additional resources designed to delineate the features of each product to assist financial advisors in providing recommendations that are in a client's best interest and consider reasonably available alternatives.

**Ameriprise Bank Certificate of Deposit:** Ameriprise Financial Services offers CDs from a range of banks, including Ameriprise Bank. We have relationships with both affiliated and third-party banks to provide client choice. When you purchase an Ameriprise Bank CD, Ameriprise Bank earns revenue based on the difference (or "spread") between the interest it receives from its investment and lending programs and what it pays to obtain the deposits. Unaffiliated banks that issue CDs do not provide direct client or financial advisor education or sales support. As a result, Ameriprise financial advisors may have a greater familiarity with Ameriprise Bank CD products.

#### *Conflicts of Interest Related to Third Party Payments and Cost Reimbursement Services*

As described above in the "*Third Party Payments and Cost Reimbursement Payment Received by AEIS*" section, AEIS receives Cost Reimbursement Payments. Cost Reimbursement Payments are not shared with your financial advisor. Ameriprise Financial Services has a financial incentive for its affiliate to continue to maintain these Cost Reimbursement Payments, including arrangements with Full Participation Firms and for AEIS to continue to receive revenue. Because not all investments provide for Cost Reimbursement Payments, Ameriprise Financial Services has an incentive to recommend or select investment products that make such payments. Ameriprise Financial Services addresses this conflict of interest by applying

objective due diligence standards and requiring all mutual funds, ETFs, ETNs, CEFs, UITs and alternative investments such as hedge funds and private placements offered for sale to meet these standards. No product sponsor makes payments to AEIS or AFS in exchange for being offered for sale.

**Mutual Fund and 529 Plan Marketing and Sales Support Payments:** Mutual fund and 529 plan marketing and sales support payments are received from certain mutual fund firms. These payments form a structure referred to as the Ameriprise Financial Mutual Fund Program ("Mutual Fund Program") with approximately 140 mutual fund families offered by Ameriprise Financial Services. Certain aspects of the Mutual Fund Program create a conflict of interest or incentive if Ameriprise Financial Services promotes, or Ameriprise financial advisors recommend, the mutual funds offered by a Full Participation Firm versus mutual funds offered by Available for Sale Firms, as described in the following paragraphs. These conflicts and incentives arise from the Cost Reimbursement Payments AEIS receives from firms participating in the Mutual Fund Program as well as "Education, Training, Seminar Reimbursement and noncash compensation" described below.

To be included in the Mutual Fund Program and be eligible for inclusion on the Starting Point List described below, each Full Participation Firm must meet a number of criteria that consider product breadth and strong-performing funds, financial strength of the firm and the ability to provide education and training to Ameriprise financial advisors, including marketing and sales support services relating to the funds they offer. Full Participation Firms have also agreed to pay our affiliate, AEIS, a portion of the revenue generated from the sale and/or management of fund shares as Cost Reimbursement Payments

**Full Participation Firms** make Cost Reimbursement Payments at a higher percentage rate than do Available for Sale Firms. This presents a conflict of interest as Full Participation Firms pay AEIS more revenue than Available for Sale Firms, and thus AEIS earns more revenue from the purchase of mutual funds offered by Full Participation Firms than from the purchase of mutual funds offered by Available for Sale Firms. You can find more information on the Full Participation Firms that participate in the Mutual Fund Program, specific arrangements we have with them (including any updates), and conflicts of interest or incentives that exist for Ameriprise Financial Services to promote (and for Ameriprise financial advisors to recommend) one fund over another fund by visiting our website at [ameriprise.com/funds](http://ameriprise.com/funds) and clicking on "Purchasing Mutual Funds Through Ameriprise."

**Available for Sale Firms** make payments to AEIS for distribution support but do not provide marketing and sales support, such as those provided by Full Participation Firms, and make payments at a lower percentage rate than Full Participation Firms. They do not have the same wholesaling access to financial advisors as Full Participation Firms. As a result, Ameriprise financial advisors may have a greater familiarity with and an incentive to sell funds of Full Participation Firms.

Certain Full Participation Firms pay our affiliate AEIS more marketing support for certain types of mutual funds. In general, Full Participation Firms offer actively managed mutual funds that permit for cost reimbursement payments to be included in the Investment Costs charged by the mutual fund. The Investment Costs of actively managed mutual funds are generally higher than those of (i) passively managed ETFs which do not make cost reimbursement payments; and (ii) actively managed ETFs which do make payments. Ameriprise Financial Services has a financial incentive to offer actively managed mutual funds and ETFs that make cost reimbursement payments to our affiliate. As a result, Ameriprise financial advisors may have an indirect incentive to sell such mutual funds and ETFs. We address this incentive by offering a full range of investment product options, including actively managed mutual funds and both actively and passively managed ETFs. In addition, we do not offer actively managed ETFs that are clones of an actively managed mutual fund from the same firm and that we also make available to clients. A similar actively managed ETF may have a lower or comparable management fee as an actively managed mutual fund. Ameriprise further addresses this conflict of interest by calculating the compensation paid to our financial advisors for all assets without regard to the amount of cost reimbursement payments we or our affiliates receive in connection with client investments in mutual funds and other investment products. Additionally, Ameriprise Financial Services does not share with our financial advisors the cost reimbursement payments we or our affiliates receive.

**Mutual Fund & ETF Recommended list ("Starting Point List"):** Ameriprise financial advisors may make mutual fund recommendations based on a group of funds that appear on the **Starting Point List**. Financial advisors are not required to use the Starting Point List as their source for mutual fund and ETF recommendations. The Starting Point List is developed by the Investment Research Group ("IRG") based on eligibility criteria established by Ameriprise Financial Services. Approximately 2,100 mutual funds are eligible for inclusion on the Starting Point List. The universe of ETFs includes funds available for sale at Ameriprise. The primary universe of mutual funds includes only mutual funds sponsored or managed by Full Participation Firms in the Mutual Fund Program. If a suitable mutual fund recommendation for a particular asset class cannot be found within the Full Participation Firms' offerings, the IRG will proceed to look for mutual fund options sponsored or managed by Available for Sale Firms. These eligibility criteria are designed by Ameriprise Financial Services to primarily include, and therefore favor, mutual funds from Full Participation Firms. This presents a conflict of interest as Full Participation Firms pay AEIS more revenue than Available for Sale Firms, and thus AEIS earns more revenue from the purchase of mutual funds offered by Full Participation Firms than from the purchase of mutual funds offered by Available for Sale Firms. Clients may choose to follow the recommendations provided by their Ameriprise financial advisor or they may select from any of the other funds offered through Ameriprise Financial Services regardless of whether that fund appears on the Starting Point List. More information on the Full Participation Firms that participate in the Program, specific arrangements we have with them, and conflicts of interest or incentives that exist for Ameriprise Financial Services to promote (and for Ameriprise financial advisors to recommend) one fund over another fund is provided on our website at [ameriprise.com/funds](http://ameriprise.com/funds) and click "Purchasing Mutual Funds Through Ameriprise."

**Actively Managed ETF Marketing and Sales Support Payments:** AEIS receives cost reimbursement payments from managers or distributors of actively managed ETFs that your financial advisor recommends to you on a solicited basis to help promote and support the offer, sale and servicing of actively managed ETFs. These payments form a structure referred to as the Ameriprise Financial ETF Program ("ETF Program") and compensate AEIS for the costs of maintaining the ETF Program. Firms participating in the ETF Program are granted full access to Ameriprise Financial Services and our financial advisors to provide direct financial advisor education or sales support to promote their products. You may also choose transactions in actively managed ETFs on your own on an unsolicited basis however these firms do not participate in the ETF Program and do not have access to financial advisors for education or sales support. As a result, Ameriprise financial advisors may have a greater familiarity with and an indirect incentive to sell funds participating in the ETF Program. Ameriprise Financial Services addresses this incentive as described above in the "Available for Sale Firms" section.

**UIT Marketing and Sales Support Payments:** Similarly, certain UIT sponsors with which AEIS has agreements may pay AEIS cost reimbursement payments to help promote and support the offer, sale and servicing of UITs. These UIT sponsors are granted full access to Ameriprise Financial Services and our financial advisors to provide direct financial advisor education or sales support to promote their products. UIT sponsors without such

agreements do not provide direct financial advisor education or sales support, thus they do not have the same access to financial advisors as full access firms. Such marketing and sales support may create a conflict of interest if Ameriprise Financial Services promotes, or Ameriprise financial advisors recommend, the UITs from UIT sponsors that have been granted full access versus UITs offered by nonparticipating firms. These conflicts may arise from the marketing and sales support provided to our financial advisors by, as well as the payments AEIS receives from, firms that have entered into such agreements.

**Education, Training, Seminar Reimbursement, and Non-cash Compensation:** As noted above, Available for Sale mutual fund firms do not provide marketing and sales support such as those provided by Full Participation Firms to Ameriprise financial advisors, thus they do not have the same access to financial advisors as Full Participation Firms. Such marketing and sales support arrangements may create a conflict of interest if Ameriprise Financial Services promotes, or Ameriprise financial advisors recommend, the investment products from product companies that have been granted full access versus those that have less or no access. These conflicts may arise from the marketing and sales support provided to our financial advisors by, as well as the Third Party Payments and Cost Reimbursement Payments AEIS receives from, firms that have entered into such agreements. Ameriprise Financial Services manages any conflict of interest as detailed in the preceding paragraphs of this section.

**Underwriters' Compensation:** From time to time, Ameriprise Financial Services or AEIS co-manages, manages or is a selling member of a public offering of securities and receives underwriter's compensation and fees as noted in the "Compensation Received by Ameriprise Financial Services" section above. Ameriprise Financial Services manages this potential conflict of interest with policies and procedures addressing (i) involvement in investment banking transactions; and (ii) the disclosure of any material ownership or other relationship the firm or its officers, directors or affiliated persons have with respect to the issuer of the security

#### *Conflicts of Interest Related to Financial Advisors and their Recommendations*

Financial advisors earn more compensation when you move assets (including rollovers and distributions from retirement plan accounts) from another institution to Ameriprise Financial Services. In addition, employee and financial advisor compensation and operating goals at all levels of Ameriprise Financial, Inc. are tied to the success of its businesses. When making recommendations, your financial advisor may have a potential conflict of interest with respect to the recommendation, as listed below. Notwithstanding such potential conflicts of interest, within a brokerage relationship, Ameriprise financial advisors are required to make securities recommendations in your best interest. Ameriprise Financial Services addresses any conflicts of interest through a combination of (i) disclosure; (ii) supervision and surveillance; and (iii) policies and procedures designed to eliminate where possible, or mitigate and disclose, our conflicts of interest related to our financial advisors' recommendations and compensation.

**Commissions and Sales Concessions:** Your financial advisor will generally receive compensation in the form of a commission or sales concession for each buy and for some sells of security transactions placed in your account. As a result, your financial advisor may have an incentive to recommend transactions for the purchase and sale of securities with greater frequency. However, your financial advisor is not permitted to recommend a series of transactions unless your financial advisor has determined that the series of transactions when considered together is in your best interest. In addition, the commission or sales concession varies from product to product, which may create an incentive to recommend a security with a higher commission. Commissions are detailed in the "Fees, Costs and Considerations Relating to Investment Products Held in Your Commission-Based Account" section above.

For certain securities, such as **VUL contracts**, compensation may also increase as the financial advisor sells increasing amounts of a death benefit. In addition, additional compensation may be paid for the following transactions

- **Additional or Replacement Products:** In instances where a customer already owns an annuity or insurance product offered 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 surrender period 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.
- **Exchange of Existing Products:** Financial advisors typically earn 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, e.g., variable annuities that are past the surrender period.

**12b-1 Fee and Trail Compensation:** Mutual funds purchased and held in a brokerage account generally pay financial advisor's compensation in the form of an ongoing payment, known as 12b-1 fee. These payments are part of the marketing and sales support payments from fund companies described above. Other investment products such as alternative investments, insurance and annuities, as well as 529 plans and retirement plans held "direct at fund" may also pay your financial advisor ongoing compensation known as trail compensation

Generally, financial advisors receive a portion of the sales charge and 12b-1 fees paid to the firm in connection with mutual fund purchases for as long as clients own the mutual fund shares at Ameriprise Financial Services. 12b-1 fees vary from mutual fund to mutual fund and from share class to share class. Both Ameriprise Financial Services and the financial advisor receive more compensation on fund or share classes that pay higher fees.

Ameriprise Financial Services and the financial advisor generally receive less compensation when the 12b-1 fee is reduced, waived completely, or where there is no sales charge or 12b-1 fee. Therefore, your financial advisor may have an incentive to recommend a mutual fund that pays a 12b-1 fee and investment products that pay trail compensation over other mutual funds or investment products that do not

**Securities-based Lending Solutions:** The Ameriprise Preferred Line of Credit, Ameriprise Preferred Loan, and margin loans are securities-based lending solutions made available to clients of Ameriprise Financial Services. These solutions are available on non-qualified accounts; however, you may not utilize both margin lending features and a pledge line of credit on the same account.

While your financial advisor does not earn compensation on your margin loan balance, your financial advisor benefits from your decision to trade using margin funds through additional sales commissions on investment products. Your financial advisor does receive ongoing compensation based on the outstanding balance of the credit line or loan extended to you for an Ameriprise Preferred Line of Credit or Ameriprise Preferred Loan. This compensation creates a financial incentive for your financial advisor to recommend the use of the Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan over margin

Ameriprise Financial manages this conflict of interest through a combination of (i) disclosures; (ii) compensating financial advisors for the Ameriprise Preferred Line of Credit and Ameriprise Preferred Loan within a reasonable range that is non-negotiable and capped; (iii) keeping client costs for negotiated rate margin loans, an Ameriprise Preferred Line of Credit and an Ameriprise Preferred Loan comparable and in line with each other by monitoring interest rates; and (iv) through the implementation and maintenance of policies, procedures, training and additional resources designed to delineate the features of each product to assist financial advisors in providing recommendations that are in a client's best interest and consider reasonably available alternatives.

**Transition Compensation Incentives:** 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 appropriateness 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.

**Incentive Programs:** Financial advisors may earn more from certain sales incentive programs to increase overall assets under management. Ameriprise Financial Services or sales leaders may, from time to time, offer incentive programs to individual financial advisors or groups of financial advisors in particular areas. These programs are limited to such targets as new client acquisition, financial plan count, the percentage of certain clients receiving financial planning advice, net flows, total assets under management and financial advisor recruiting. Single product or product categories are not eligible for incentive programs with the exception of fixed life 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. Ameriprise Financial Services addresses any conflict of interest by reviewing these programs and incentives and other cash and/or noncash compensation for compliance with SEC and FINRA regulations as well as Ameriprise Financial Services' internal compliance policies.

**Sales Leader Incentives:** 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.

*Conflicts of Interest Related to Certain Securities Transactions.*

**Principal Trading:** Principal trading occurs when AEIS executes your order from its own inventory. When AEIS sells a security from its inventory or buys a security from you for its own inventory, you generally will pay a markup (an increase) or markdown (a reduction) on the price of the security. The markup or markdown is retained by AEIS and may be more than the sales credit or commission charged on an agency trade.

**Agency Cross Transactions :** AEIS may engage in agency cross trades between brokerage clients and receive commissions on both sides of the transaction. A cross trade occurs when a financial advisor solicits both a buy and a sell transaction for the same security from one client account to another client account. All trades are executed at the same time without risk of principal to the firm.

Ameriprise Financial Services will act in the best interest of its clients, including, but not limited to, seeking best execution on all client transactions including both principal trades and agency cross trades in a brokerage relationship. Both AEIS and Ameriprise Financial Services have implemented various policies and procedures to address any potential conflict of interest, including but not limited to (i) procedures regarding the appropriateness, supervision and best execution of securities recommended to, or purchased to or from, Ameriprise Financial Services client accounts; and (ii) not allowing trading desk employees or associated persons to provide recommendations to financial advisors or clients.