

Equal Opportunity and Affirmative Action Program Policy Statement

Summary

Ameriprise Financial, Inc. has implemented the following policies and procedures as part of its longstanding commitment to compliance with all applicable equal opportunity and affirmative action requirements.

Equal Opportunity Policy

Ameriprise Financial, Inc. is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. It is therefore the company's policy to prohibit discrimination and harassment against any applicant, employee, vendor, contractor, customer, or client on the basis of race, color, religion, sex, sexual orientation, gender identity, gender expression, national origin, ancestry, age, physical or mental disability, medical condition, pregnancy, veteran status, genetic information, citizenship status, marital status, family status or any other basis prohibited by law. It is also the company's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct or participated in a company or agency investigation into such complaints.

Affirmative Action Policy

Ameriprise Financial, Inc. is also a federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, Ameriprise Financial, Inc. is committed to taking positive steps to implement the employment-related aspects of the company's equal opportunity policy. Accordingly, it is Ameriprise Financial, Inc.'s policy to take affirmative action to employ, advance in employment, and otherwise treat qualified minorities, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex/sexual orientation/gender identity, veteran status, or physical or mental disability. Under this policy, Ameriprise Financial, Inc. also will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of the company's business.

The company's affirmative action policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats or discrimination because they have engaged in or may engage in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the affirmative action program for individuals with disabilities and protected veterans shall be available for inspection upon request during normal business hours by any employee or applicant for employment by contacting Carolyn Koleske, Sr. Director, HR Compliance, at 612.671.3080.

Application of Equal Opportunity and Affirmative Action Policies

These policies apply whenever and wherever a company employee is performing a function of his or her job, including all Ameriprise Financial, Inc. locations, client worksites, and company-sponsored or client-sponsored business and social functions. The company's equal opportunity and affirmative action policies require that employment decisions be based only on valid job requirements, and extend to all

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terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions.

Workplace Harassment, including Sexual Harassment

A key component of the company's commitment to equal opportunity is zero tolerance for workplace harassment based on, or because of, an individual's race, color, religion, sex, sexual orientation, gender identity, gender expression, national origin, ancestry, age, physical or mental disability, medical condition, pregnancy, veteran status, genetic information, citizenship status, marital status, family status or any other reason prohibited by law. Such harassment, whether committed by employees or by clients, customers, vendors, or other individuals doing business with Ameriprise Financial, Inc. will not be tolerated. Refer to the company's Individual Treatment Policy for additional information.

Prohibited harassment occurs when a leader, co-worker, or even a non-employee behaves or acts in such a way that creates a hostile work environment for another employee based on an individual's race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status, marital status, family status or other protected characteristic. Ameriprise Financial, Inc. leadership is responsible for ensuring compliance with all aspects of this equal employment opportunity policy and for developing implementation strategies that promote its intent.

Obligations of Employees

Ameriprise Financial, Inc. employees have an obligation to contribute to a harassment- and discrimination-free workplace. Any employee who experiences or observes harassment or any other violation of this policy is strongly encouraged to notify one of the individuals identified below. Ameriprise Financial, Inc. will promptly and thoroughly investigate the alleged misconduct and, if a violation of this policy is found, will take immediate and appropriate corrective action.

Non-retaliation

Every employee is encouraged to come forward without fear of reprisal, as Ameriprise Financial, Inc.'s equal opportunity and affirmative action policies prohibit any and all forms of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been subjected to retaliation, your complaint should be directed to Employee Relations.

After receiving a complaint involving a violation of the company's equal opportunity or affirmative action policy, the company will investigate and take corrective action, as appropriate. Complaints and investigations will be kept confidential, except as required to complete an investigation and review process or unless the company is required to disclose it due to legal or regulatory requirements. No one, regardless of position or length of service, is exempt from these policies.

Responsibility for Implementation

Each leader is responsible for the implementation of these policies at his or her location, assisted by Human Resources. Complaints or questions should be directed to Employee Relations or your Human Resources Business Partner.

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This document does not create a contract of employment or a contract for any specific term or condition of employment between Ameriprise Financial and an employee. The relationship between Ameriprise Financial and an employee is at-will, meaning that either the employee or the company may terminate it at any time for any reason, with or without advance notice or progressive disciplinary action. Nothing in this policy is intended to prohibit employees from exercising their rights under Section 7 of the National Labor Relations Act.

Ameriprise Financial reserves the right to make changes in or discontinue company policies, compensation plans, benefits and programs as it deems appropriate and these changes may be implemented even if they have not been communicated in this (or by change to this) document or otherwise. The company takes reasonable efforts to ensure the accuracy of the contents of policy documents and in the administration of its policies and programs. The company does not assume responsibility for consequential damages caused by administrative or clerical errors.

If this document refers to any company benefit program, it describes only certain highlights of the company's benefit program. It does not supersede the actual provisions of the applicable plan documents, which in all cases are the final authority. The applicable plan administrator has the sole authority and discretion in determining eligibility and in interpretation and administration of the plans.

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