



Be Brilliant.®

Ameriprise Financial Client Relationship Guide

Understanding your relationship with
Ameriprise Financial and your financial advisor

Ameriprise Financial takes safeguarding your accounts seriously

We value the confidence you have placed in us and are committed to ensuring your account information and access are safeguarded. To find out more about how to keep your information secure and to view our Online Security Guarantee, visit the Privacy, Security & Fraud Center at ameriprise.com/privacy.

Safeguard: We take our responsibility to safeguard your personal information very seriously and have multiple controls in place to protect your identity and account information. When you register to access your accounts on the secure site on ameriprise.com, we ask you to select three security questions and create answers that only you will know. And if we ever need to confirm your identity, we give you the option of answering one of these questions or requesting a one-time passcode.

Tip: You can also take these steps to help protect yourself from online fraud:

- Ensure your online user name and password are secure and remain confidential. If you want to provide access to your online accounts to someone else, please formally designate that person(s) with a power of attorney.
 - Sign up to receive text and email alerts to notify you about activity on your Ameriprise accounts. Just log on to the secure site on ameriprise.com and select Profile > Communication Preferences to set up and manage alerts.
 - Use the Message Center to share account and personal information with your financial advisor safely and securely. Log in to the secure site on ameriprise.com and select Transfers & Tools > Message Center.
 - Install antispyware, antivirus and firewall software to protect information on your computer.
 - We will never ask you to provide your personal information or account information through an email message.
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Safeguard: When you contact us, whether online at ameriprise.com or through the Customer Service Department, we will ask you for personal information to verify your identity. This is done for your protection.

Tip: Never share this type of personal identity information with others.

Safeguard: Your financial advisor may make certain transactions, such as buying and selling securities or sending disbursements from your account, on your behalf by following your instructions. Other transactions, such as trading in a discretionary manner or distributing money to third parties via check or wire/ACH transfer, require your written authorization. All transactions will be included in your account statement. Additionally, with most transactions involving investments, financial planning services or money movement to third parties, we will send you original transaction confirmations.

Tip: It's a good practice to review every statement and confirmation you receive from us. Make sure that the transactions are accurate and have been carried out as you intended. If you have any concerns, contact your financial advisor or the Customer Service Department at 800.862.7919.

Safeguard: For your protection, we require that checks be made payable to an appropriate Ameriprise entity, such as Ameriprise Financial Services, Inc., or American Enterprise Investment Services, Inc. (AEIS).

Tip: Never make a check payable directly to your financial advisor or local financial advisor office. Please consult with your advisor on which entity you should make checks payable to.

Safeguard: Ameriprise Financial Services, Inc. (Ameriprise Financial), does not accept cash.

Tip: Your financial advisor will not accept cash. Please do not ask your financial advisor, his or her staff, or any other Ameriprise Financial employee to do so.

Safeguard: Checks for money market accounts and your *Ameriprise ONE*® Financial Account will be sent directly to the address you provided. Your financial advisor cannot receive them for you.

Tip: If you don't receive requested checks or drafts within 20 days of opening an account, contact the Customer Service Department at 800.862.7919.

Safeguard: We have a very strict policy regarding forgery. Financial advisors, their staff and any Ameriprise Financial employees are not allowed to sign any documents for you, even if you have given them permission.

Tip: Your financial advisor will not sign your name. Please do not ask your financial advisor to sign agreements or other forms on your behalf.

Welcome to Ameriprise Financial

We're honored that you chose Ameriprise Financial to help you plan your confident financial future. We want you to get the most out of your ongoing relationship with us, so we developed this guide to give you a better understanding of our company and what we offer.

This guide contains information on:

- Our commitment to you Page 2
- Understanding your financial solutions Page 4
- Our company and how we get paid Page 17
- Ameriprise Financial Business Continuity Management Program Page 38
- Resolving issues or concerns Page 41

Not all the information in this guide will apply to you. But you can use it as a resource, so you have the information you need to make informed decisions. As you consider additional products and services, please be sure to review all pertinent prospectuses and other documents.

The Ameriprise Financial Client Relationship Guide is regularly updated. You can always find the most current guide at ameriprise.com/guide.

We're committed to helping you achieve your financial goals throughout your lifetime and want you to have a fulfilling relationship with us. If you have questions about this guide or any aspect of our relationship with you, please consult your financial advisor.

Sincerely yours,



Marie L. O'Neill
Senior Vice President | Marketing

Investment products are not federally or FDIC-insured, are not deposits or obligations of, or guaranteed by any financial institution, and involve investment risks including possible loss of principal and fluctuation in value.

Investors should consider the investment objectives, risks, charges and expenses of a mutual fund, certificate, variable annuity or variable life insurance product or 529 plan carefully before investing. For a free prospectus, disclosure documents or other important information about financial products, call 800.862.7919. Read the prospectus and/or disclosure information before you purchase or invest.

Our commitment to you

We listen

We take the time to talk with you — to get to know your dreams and goals — now and throughout our relationship with you.

We provide personal, high-quality advice

- Our approach is based on sound financial principles and a full view of your needs.
- We go beyond the numbers to understand your needs and provide you with clear actions you can take to help you achieve your dreams and feel more confident about the future.
- We tailor our advice to your personal objectives, time horizon and risk tolerance, as well as other factors.

We offer a variety of product solutions designed to meet your unique needs

We believe every client should have access to a comprehensive and competitive selection of products that provide:

- A thoughtful approach to managing your cash flow, including solutions for saving, spending and borrowing
- Confidence in your investment strategies — tailored and flexible to address your particular needs
- Protection for the things that matter most
- Control over taxes and what you leave to your heirs

We have a long-term focus on your goals

- The ongoing relationship between you and your advisor is at the heart of what we do, to help you track your progress and adapt to changes in your life.
- We regularly reach out to you with meaningful information and ideas.
- We offer the Ameriprise Rewards and *Achiever Circle* programs to recognize your financial progress and success.

We provide full and clear information

You can expect us to be up front and accurate, offering full and clear information in all areas, including:

- The benefits, material risks and costs of financial solutions we recommend
- Information about any significant conflicts of interest related to the financial relationship between you and Ameriprise Financial or your financial advisor
- Timely transaction confirmations, account statements and other communications from us, with your choice of paper or electronic delivery for many materials
- Full details of costs associated with our services and the costs related to individual transactions, including commissions, sales charges (or loads) and other fees
- Descriptions of our policies and practices for the collection, use and safeguarding of your nonpublic personal information

We are committed to quality service

- We make it easy to work with us by doing our best to anticipate your needs and provide you with intuitive, flexible ways to find what you need.
- You can expect fair, ethical and respectful treatment in all interactions with us.
- You can work with the financial advisor of your choice. If you are ever dissatisfied with the service you receive, you can request a different financial advisor by calling 800.862.7919.
- You can expect fair consideration and a prompt response from us if you experience an issue or have a concern. If, for any reason, any issue or concern is not resolved to your complete satisfaction, you should contact your financial advisor right away. If the issue or concern is still not settled to your satisfaction, follow the additional steps outlined on page 42 of this guide.

Making the most of your relationship with Ameriprise Financial

Inform and educate yourself

- Seek out information by asking your financial advisor questions about your financial plan, your accounts, specific transactions, risks, potential conflicts of interest, financial terminology, commissions, sales charges and fees.
- If you don't understand the purpose of a recommendation by your financial advisor, ask questions until you fully understand.
- Read thoroughly all sales literature, prospectuses, account agreements, policies and contracts, and, when available, other offering documents before making financial decisions. Consider carefully all risks, fees and other factors explained in these documents. Remember — every investment has some degree of risk, and it is possible to lose money on any investment.
- Ask your financial advisor how you may be able to manage these risks. Some risks relate to market fluctuations, inflation rates, credit ratings of bond and securities issuers, tax issues, currency-exchange rates for international investments, the liquidity of your investments and withdrawal rates.
- Withdrawal-rate risks are especially critical if you are preparing for or are in retirement, and your withdrawal rate is a major factor in how long your assets will last. Even when your portfolio is appropriately structured and your investments are performing well, we recommend that you consider several factors when deciding how or when to withdraw your money. In general, your age, your life expectancy, and the type and amount of your investments will help you determine the best way to access your money. Periodically reviewing your retirement income strategy with your financial advisor can help you plan for and manage this risk over time.

Communicate with your financial advisor

- Provide complete and accurate information about your financial situation, goals and risk tolerance so your financial advisor can provide you with appropriate planning advice and recommendations.
- Review your financial plan and portfolio regularly, including whenever you experience a significant change in your life. You may also want to make appropriate changes based on the performance of your investments.

- Notify your financial advisor promptly whenever you experience a significant change in your life, for example, if your financial goals, income or net worth changes.
- Tell your financial advisor about mutual fund holdings you own outside of Ameriprise Financial, so he or she can make sure you receive any applicable “breakpoint” discount.

Keep your accounts current

- Work with your financial advisor to ensure you have adequate cash holdings or available margin-buying power in your investment accounts. When buying securities, withdrawing money from your account or paying fees, having adequate cash on hand will make these processes faster and easier.
- Review all transaction confirmations and account statements or reports carefully. If you find an error or discrepancy, please promptly contact your financial advisor or call us at 800.862.7919.
- When things change — like your address, other contact information or even beneficiary designations — let us know right away so that we can stay in touch without interruption and stay current with your wishes.
- Please remember, all states require financial firms to report and remit client accounts with undeliverable addresses or no sign of client activity after a state specified period of time, which can easily be avoided by keeping your accounts and personal information current.

Use the right resources — carefully

- Understand that Ameriprise Financial does not provide legal or tax advice. You should consult an attorney or a tax adviser for legal and tax questions, respectively.
- Keep in mind that you are fully responsible for all your financial decisions.
- Consider carefully the validity and reliability of financial and investment information obtained from all sources, especially unsolicited information obtained over the Internet.
- The opinions of your financial advisor should never be interpreted as a guarantee of future performance or rate of return.
- It's important to understand that the manner in which your advisor is compensated — described later in this guide — may create a potential conflict of interest. We believe it's in everyone's best interest to know about potential conflicts of interest up front. To that end, if you have any questions about conflicts of interest after reading this guide, discuss them with your financial advisor.

Understanding your financial solutions

As you begin pursuing your financial goals, it's important to understand the features as well as the fees, costs and other factors associated with the products and services you may purchase. While not all the information will apply to your specific situation today, we encourage you to refer to this information whenever you purchase new products or services.

Our products and services

Financial planning

Financial planning services

Our flexible approach to financial planning is based on your unique situation and financial goals. We'll help you plan for your dreams and goals based on an integrated view of your financial life, create personalized written recommendations and help you track your progress over time.

Before purchasing financial products, be sure to read these documents (provided by your financial advisor):

Ameriprise Financial Planning Service Client Disclosure Brochure

Ameriprise Financial Planning Service Agreement

Additional product details

Ameriprise financial planning service fees

Fees are determined by the complexity of your situation and your financial advisor's financial planning fee schedule. When you participate in ongoing financial planning, you pay an annual fee. The fee for the first year of service may differ from the fee you pay in future years. You also have the option to engage in a consolidated advisory fee relationship for which you will pay a single asset-based fee for the Advisory Solutions program and financial planning.

Other things to consider

The initial meeting is free of charge, and is an opportunity to share your dreams and goals and get to know your advisor.

In most cases you may need only one agreement, amended as needed for fee changes, relating to your ongoing financial planning services.

The financial planning recommendations you receive are portable. You can act on these recommendations by purchasing products and services through Ameriprise Financial or another financial services provider.

Over the course of your relationship with Ameriprise Financial, you may work with more than one financial advisor. If for any reason your financial advisor changes, we will work with you to ensure that your needs are met during that transition. At all times, we remain committed to helping you achieve your financial goals.

Accounts

Transaction-based brokerage accounts

Many of the products you purchase are held in your Ameriprise® Brokerage account or Ameriprise ONE® Financial Account.

Before purchasing financial products, be sure to read these documents at ameriprise.com/disclosures:

Ameriprise Brokerage Client Agreement

Other Important Brokerage Disclosures

Margin Disclosure Statement

Ameriprise Financial Schedule of Account and Service Fees

Additional product details

Brokerage fees

Transaction charges. You may pay commissions, sales charges and/or other fees on products purchased and sold in your brokerage account.

Account maintenance fees. The account maintenance fee will be deducted directly from the cash balance in your account. If there is not enough cash in your account to cover the fee, we may sell securities in your account in an amount sufficient to cover the full year's fee. In some instances, the account maintenance fee may be waived by Ameriprise Financial or reimbursed by your advisor.

Service fees. If applicable, fees for wire transfers, returned checks, overnight delivery and similar services will be deducted directly from the cash balance in your account. Note that the fee schedule may be revised from time to time. Service fees may be waived by Ameriprise Financial or reimbursed by your advisor.

Interest on margin account. If you have an account with margin-lending capabilities, you will be charged interest on any outstanding debit balance.

Transaction-based brokerage accounts (continued)**Other things to consider**

- You will not be charged an annual asset-based fee on products held in a brokerage account.
- Your brokerage account maintenance fee or applicable service fees may be reimbursed under certain circumstances — for example, the account maintenance fee is reimbursed when you or your household maintains a certain account balance. In addition, under certain circumstances, your financial advisor has the ability to reimburse your account for service fees or account maintenance fees through a program made available by Ameriprise Financial.

To learn more about available fee reimbursement and waiver programs, talk with your financial advisor.

- The Ameriprise Financial Institutions Group (AFIG) financial advisor channel will limit the direct at fund business formerly conducted by Investment Professionals, Inc. (IPI) and consolidate assets held directly with product companies into accounts at Ameriprise. During this period of transition to Ameriprise, brokerage accounts formerly served by IPI and new brokerage accounts assigned to AFIG advisors will not be assessed account maintenance or qualified account custodial fees. Such fees will be assessed to AFIG client accounts beginning January 2021.

Advisory solutions

With the Ameriprise® Custom Advisory Relationship, you can now have access to all advisory solutions (managed accounts) at Ameriprise within a single advisory client agreement. All advisory solutions accounts will have a single pricing framework:

Nondiscretionary advisory accounts provide you access to a broad array of mutual funds, exchange traded funds (ETF) and other publicly traded securities. You can bring all your investments together into one coordinated and flexible portfolio, allocated according to your investment needs, with the added benefits of ongoing financial advice and portfolio reviews.

Discretionary advisory accounts are available in a variety of solutions:

- A variety of asset-allocated portfolios comprised of mutual fund and/or ETF portfolios are overseen by professional investment managers who provide asset allocation, investment selection, and portfolio construction with ongoing monitoring and dynamic reallocation.
- Your Ameriprise financial advisor directs the purchase or sale of a broad array of mutual funds and other publicly traded securities within a single account on your behalf. Your financial advisor will purchase and sell securities in your Account that are suitable for you and consistent with your investment objectives, time horizon, financial situation and risk tolerance.
- Separately managed accounts (SMAs) give you access to professional investment managers who typically provide services to institutional investors like pension plans and foundations. In addition, SMAs allow you direct ownership of securities, providing greater transparency of holdings, the potential for customization based on your individual values and personal tax-management opportunities.

Advisory service fees

Annual asset-based fee. For each account, you pay an annual asset-based fee, or wrap fee, based on the services provided and the assets held within your advisory account(s). This annual fee is generally broken into monthly payments.

Service fees. Fees, if applicable, are deducted directly from the cash balance in your account (e.g., wire transfers and returned check fees). A complete list can be viewed online at ameriprise.com/brokeragefees.

Interest on margin account. You will be charged interest on the outstanding margin balance if you have a margin account. Margin is only available for nondiscretionary investment advisory accounts.

Fees may vary. Types of fees for each advisory program offering may vary. Please consult the *Ameriprise Managed Accounts Client Disclosure Brochure* and the *Ameriprise Custom Advisory Relationship Agreement* for details.

Other things to consider

- You will not pay sales charges on investment advisory assets purchased in managed accounts. If Ameriprise receives distribution and shareholder fees or 12b-1 fees for mutual funds held in managed accounts, they will be rebated to your account(s). Some investments have their own underlying fees and expenses. These costs are in addition to the asset-based fee that you pay directly from your account. They are paid indirectly by you; for example, as a shareholder in a mutual fund, through the product. Examples of those fees and expenses are described later in the investment product overviews.
- You will not be charged an account maintenance fee for advisory solutions programs.

Advisory solutions (continued)

- Unified managed accounts (UMAs) are innovative investment vehicles that can hold SMAs, mutual funds and ETFs in a single account. UMAs give you access to top investment managers at lower asset levels, all in one unified account.

Before entering into a custom advisory relationship and associated account(s), be sure to read the following documents (provided by your financial advisor or online):

- *Ameriprise Managed Accounts Client Disclosure Brochure*, or if you have elected to pay a consolidated advisory fee, the *Ameriprise Managed Accounts and Financial Planning Service Disclosure Brochure*
- *Ameriprise Custom Advisory Relationship Agreement*
- *Ameriprise Brokerage Client Agreement*
- *Other Important Brokerage Disclosures*
- *Ameriprise Financial Schedule of Account and Service Fees*
- *The Pension Protection Act (PPA) Advice Exemption: What Our Clients Should Know* for applicable qualified accounts
- Financial advisor(s) ADV Brochure supplement
- Any applicable portfolio/strategy fact sheets
- Available information about the trading practices of each investment manager, including the average cost of step-out trades for the applicable investment strategy.

Individual retirement accounts (IRAs)

An IRA is designed to help you save for your retirement. The Internal Revenue Service (IRS) restricts the amount you can contribute to an IRA. Ameriprise Financial offers a variety of IRAs, including traditional IRAs, Roth IRAs, Simplified Employee Pension (SEP) IRAs and more. IRAs can include a variety of account types, including transaction-based brokerage, fee-based investment advisory and certificate accounts.

Before opening an IRA account, be sure to read the following documents (provided by your financial advisor):

Your Guide to IRAs

Your Guide to Roth IRAs

Your Guide to SIMPLE IRAs

Ameriprise Financial Schedule of Account and Service Fees

Other things to consider (continued)

- The annual asset-based fee covers transaction costs when trades are executed on an agency basis through our affiliated clearing agent, AEIS. If you invest in an SMA and the investment manager places transactions for execution with a third-party broker-dealer other than AEIS, referred to as “step-out trades,” any additional trading costs incurred will be passed along to you, are included in the purchase or sale price of the transacted security, and are in addition to the annual asset-based fee.
- If you purchase both financial planning services and an asset-based investment advisory account, it's important that you understand what you're paying for — financial planning services, investment advisory account services or both. If you enroll in both, you can choose to pay separate and distinct investment advisory fees for each service or you may have a consolidated advisory fee service for which you will pay a single asset-based fee.
- The total asset-based compensation received by Ameriprise Financial and its affiliates in the aggregate includes payments (i) directly from you in the form of the asset-based fee, and (ii) indirectly through third party payments as described in the Cost Reimbursement Services and Third Party Payments section below.
- A discretionary account is one in which you give your financial advisor or an advisory service provider authority to buy and sell securities in your account without obtaining your consent for each specific trade. In a nondiscretionary account, your financial advisor must obtain your consent before each transaction is executed on your behalf.

Periodic fees and expenses

You may be required to pay an **annual IRA custodial fee** in addition to the fees and expenses related to your account and underlying investments.

We may reimburse your annual IRA custodial fee or applicable service fees under certain circumstances — for example, the fee is reimbursed when you or your household maintains a certain account balance. The annual custodial-fee waiver does not include fees or sales charges related to your transaction-based brokerage or fee-based investment advisory account or to the underlying investments within your IRA. To ensure that you are obtaining all available waivers, please talk with your financial advisor.

Service fees. If applicable, fees for wire transfers, returned checks, overnight delivery and similar services will be deducted directly from the cash balance in your account. Please note that the fees may be revised from time to time. A fee schedule can be viewed online at ameriprise.com/brokeragefees.

Other things to consider

- Traditional IRAs offer the opportunity for tax-deferred growth of any earnings and may permit tax-deductible contributions.
- Roth IRAs offer the opportunity for tax-free growth of any earnings, when all IRS conditions are met, but do not permit tax-deductible contributions.

Accounts (continued)

529 plans

A 529 plan is a tax-advantaged savings plan designed to encourage saving for future education costs. Earnings in 529 plans are subject neither to federal tax nor, in most cases, state tax as long as withdrawals are used for eligible education expenses, such as tuition and room and board. Ameriprise Financial offers a variety of 529 plans from several different mutual fund families, including plans in many of the states that offer state tax deductions or credits on 529 contributions.

Ameriprise offers 529 plan accounts held both directly at the 529 plan sponsor and held in an *Ameriprise*[®] brokerage account.

Before purchasing a 529 plan, be sure to read the 529 Plan's Official Statement, provided by your financial advisor.

Additional product details (continued)

Sales charges

Depending on the share class you purchase, you may pay a **front-end load** or a **back-end load**. See "Mutual funds" on the following page.

Periodic fees and expenses

The following fees may be charged by the 529 plan sponsor:

- **Annual maintenance fee**, which may be reduced or eliminated based on certain criteria, such as making systematic purchases or maintaining a certain minimum balance.

For information on periodic fees and expenses of 529 plans held in an *Ameriprise*[®] brokerage account, see "Brokerage Fees" on pages 4–5.

In addition:

- **Administration/management fees**, based on a percentage of daily net assets, are paid monthly to the 529 plan sponsor for the investment management and administrative services it provides.
- **Expenses of underlying funds** are paid indirectly through periodic fees and expenses charged by the underlying mutual funds in which your 529 plan invests. See "Mutual funds" below.

Other things to consider

Favorable state income-tax treatment and benefits for investing in a 529 plan may be available only if you invest in a 529 plan offered by the state in which you pay taxes. Benefits vary from state to state. For more information, consult with a qualified tax professional or contact the 529 plan for the state in which you pay taxes.

Investment products

Stocks, bonds, options and structured products

A wide range of individual securities — including stocks, bonds, options and structured products — are available when you establish a transaction-based brokerage account or a fee-based investment advisory account.

Before opening a brokerage account, be sure to read the following documents (provided by your financial advisor):

- *Ameriprise Brokerage Client Agreement*
- *Other Important Brokerage Disclosures*
- *Applicable Structured Product Disclosure Document and Risk Acknowledgement Form*
- *Characteristics and Risks of Standardized Options*
- *Ameriprise Financial Schedule of Account and Service Fees*

Prior to entering into a custom advisory relationship and associated account(s), review the list of documents under "Advisory solutions" on page 6.

Additional product details

Sales charges

If purchasing securities through a transaction-based brokerage account:

- At the time of purchase, you may pay a commission, transaction fee or markup on securities purchased.
- At the time of sale, you may pay a commission, a markdown or a transaction fee on the security sold.

Commissions do not apply to securities purchased within a managed account, although you pay an annual asset-based fee.

Mutual funds

We currently sell mutual funds from more than 150 fund companies through a transaction-based brokerage account and through certain fee-based investment advisory accounts. These fund families include Columbia Threadneedle Investments family of Funds (including funds branded Columbia, Columbia Acorn and Threadneedle) (“Columbia Funds”), which are managed by Columbia Management Investment Advisers, LLC (Columbia Management Investment Advisers or CMI), or Columbia Wanger Asset Management, LLC (Columbia Wanger), our affiliates.

Before purchasing mutual funds, be sure to read the following documents (provided by your financial advisor):

- Prospectus(es) of funds in which you may want to invest
- *An Investor’s Guide to Purchasing Mutual Funds through Ameriprise Financial* (found at ameriprise.com/funds)

Other useful sources of information:

You can learn more about fund families and mutual funds offered in our transaction-based brokerage accounts and our managed accounts with our online Mutual Fund Screener Tool.

Visit www.ameriprise.com/research-market-insights/fund-screeners/

Check out the Fund Analyzer at the Financial Industry Regulatory Authority website (finra.org) to help you determine the share class you may be eligible for and want to purchase.

Sales charges

If purchasing mutual funds through a transaction-based brokerage account, one of the following sales charges will apply:

- **Time of purchase:** a front-end load of up to 5.75% on mutual fund Class A shares
- **Time of sale (or “redemption”):** a back-end load (or “contingent deferred sales charge”) on some mutual fund share classes you sell within a certain period

If purchasing mutual funds through a fee-based investment advisory account, the above sales charges (front-end or back-end load) do not apply — although you will pay an annual asset-based fee (as described in the account overview section). Sales charges do not apply to money market mutual funds.

Periodic fees and expenses

You indirectly pay a fund’s operating expenses, which are paid from the general assets of the fund. These fees reduce investment performance. Operating expenses may include the below fees (as disclosed in the fee and expense table of each fund’s prospectus).

- **Management fees** are paid from the fund to the fund’s investment advisor for services, including research, portfolio-manager and trader compensation, and technology and related administrative services.
- **Distribution and shareholder servicing (12b-1) fees** are paid by the fund to the fund’s principal underwriter for distribution and marketing-related expenses and ongoing shareholder services. The principal underwriter typically pays a portion of these fees to dealers and their financial advisors who sell the funds and service shareholders of the fund. For transaction-based brokerage accounts, we receive these fees and pay a portion of these fees to financial advisors who sell funds and service fund shareholders. If we receive these fees for mutual funds held in managed accounts, they will be rebated to clients.
- **Other expenses** typically include other operating fees and expenses paid by the fund, including administration, transfer-agency, custodial and other nonadvisory fees.

Funds also pay **portfolio transaction costs**. These include brokerage commissions paid to brokers for trading portfolio securities held in the fund. Funds also pay implied commissions (or “markups”) for principal transactions (e.g., transactions made directly with a dealer) in most fixed-income securities and options or other derivatives. These costs are in addition to the operating expenses described on the previous page.

Funds that invest in other funds (underlying funds), including funds of funds, incur fees and expenses associated with owning shares of the underlying funds (acquired fund fees and expenses).

Mutual funds (continued)**Other things to consider**

- Mutual funds are offered in different share classes — usually Classes A, C, no-load, advisory and institutional classes. The classes differ in sales charges and ongoing fees. The right share class for you typically depends on things like how long you plan to hold the fund, the amount you are able to invest, the expenses you pay and whether you qualify for breakpoint discounts. Advisory, institutional or other share classes that do not have a sales charge and do not assess distribution and shareholder servicing (12b-1) fees (collectively, “Advisory Shares”) are offered in all managed accounts as the primary mutual fund share class, where available to us through a selling agreement.
- Many mutual fund companies offer breakpoint discounts if you invest more than a certain dollar amount. These discounts may be based on your current purchase or on your total holdings in the fund family, including the holdings of your family or household members. Certain account types, such as retirement plan accounts, may be eligible for discounts and waivers.
- To ensure that you are obtaining all available discounts and waivers, please work with your financial advisor or check the fund’s prospectus or website. You may also qualify for an advisor, institutional or other share class with lower expenses and fees outside of a transaction-fee based brokerage account or a managed account service.

Alternative Investments

Ameriprise Financial offers alternative investment solutions that include 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, private equity offerings, real estate private placement funds, 1031 exchanges and exchange funds. Your financial advisor can provide more information about alternative investments upon request.

Alternative investments fees and expenses

Further information about the risks, fees and expenses of these products are disclosed in the client application or risk disclosure document you sign, as well as the prospectus or private placement memorandum you receive. Read these documents carefully before you invest.

Non-traded REITs

Ameriprise Financial offers publicly registered, non-traded REITs.

Non-traded REITs are investment programs that pool funds from individual investors to acquire real estate and real estate-related securities. Non-traded REITs may provide income to clients in the form of monthly or quarterly distributions based on the rent or mortgage payments, may provide capital appreciation through growth, or may provide a combination of both income and capital appreciation.

Before purchasing, be sure to read the following documents (provided by your financial advisor):

- *Non-traded REIT prospectus*
- At the time of purchase, be sure to review with your financial advisor the following section of the *Direct Investment Application for Non-traded Real Estate Investment Trusts (REITs): Suitability Requirements and Client Review of Risks (Parts 3 and 6)*

Non-traded REIT fees and expenses

All fees and expenses related to your investment in a non-traded REIT are paid for out of your invested capital. Typically, 12–15% of your investment goes to pay for expenses of organizing the offering of the non-traded REIT and for acquiring properties, etc. These costs include, but are not limited to:

- Selling commissions
- Ongoing distribution fee
- Dealer/manager fees
- Marketing support fees
- Fund-formation expenses
- Accounting expenses
- Attorney expenses
- Organization and offering expenses
- Acquisition fees
- Technology costs
- Ongoing investment or property-management fees
- Asset-management expenses

A further description of these expenses can be found in the non-traded REIT prospectus.

Non-traded REITs (continued)**Other things to consider**

- There may be a less expensive or less complicated product that could be more suitable for you.
- Non-traded REITs are not appropriate for all investors. You should carefully consider the investment objectives, risks, charges and expenses of these products before investing.
- There are net-worth and/or liquid net-worth thresholds you must meet, which vary by state and non-traded REIT offering.
- Shares of non-traded REITs are not easily converted to cash and are not traded on a public stock exchange. There is no formal secondary market for non-traded REITs. Redemption programs vary by non-traded REIT issuer and are limited. It may be difficult to liquidate your investment.
- Non-traded REIT products are complex, long-term, illiquid investments and are suitable only for clients with long-term investment goals of at least 7–10 years. There can be no assurance that a secondary market for the non-traded REITs will exist. An investment in a non-traded REIT is subject to many of the same risks as a direct investment in real estate. Such risks include, but are not limited to, market risk, issuer-creditworthiness risk, economic risk, distressed-property risk, diversification risk, sector/concentration risk and higher-volatility risk. In addition, some of the properties held in non-traded REITs may be subject to balloon-payment financing, refinancing of maturing debt and/or bankruptcy, resulting in a potentially significant decline in the overall value of the non-traded REIT.
- Distributions are not guaranteed and may be suspended or halted. Distributions may exceed operating cash flow, resulting in return of principal.
- Non-traded REITs may use leverage, which may accelerate the velocity of potential losses.
- Ameriprise Financial is a distributor of non-traded REIT offerings and does not participate in selecting, managing or selling the underlying properties or investments of these products.
- The value of a non-traded REIT fluctuates with the portfolio of the underlying real-estate properties; shares may be sold at a price that may be more or less than the original price you paid; and there may be significant conflicts of interest as disclosed in the fund's prospectus.

Ameriprise Certificates

Ameriprise® Certificates are registered Investment Company Act products that offer liquidity options as well as:

- Flexible terms
- Principal guaranteed by the Ameriprise Certificate Company (ACC)
- Low investment minimums — as little as \$50 per month
- Rates designated by the Ameriprise Certificate Company

Ameriprise Certificates entitle you to receive, at the end of a stated period, an amount equal to the amount you invest, plus interest at predetermined rates. The initial rates we determine will be established and communicated to you at the time of purchase unless they are based upon the return of a market index.

Periodic fees and expenses

Withdrawal penalties may be deducted from your certificate account balance if you withdraw money during the term, depending on the certificate product. The *Ameriprise* Cash Reserve Certificate does not have any withdrawal penalties. The other fees and expenses listed below are paid by the ACC and will not be charged to your account.

Advisory and services fees are paid by the ACC to the company's investment adviser, Columbia Management Investment Advisers, LLC, for managing certificate assets and providing other services to the ACC.

Distribution fees are paid by the ACC to Ameriprise Financial Services, Inc., for the distribution of *Ameriprise* Certificates.

Transfer agent fees are paid by the ACC to Columbia Management Investment Services Corp. for the maintenance of certificate-owner accounts and records.

Investment products (continued)

Ameriprise Certificates (continued)

Before purchasing an *Ameriprise* Certificate, be sure to read the *Ameriprise* Certificates Prospectus (provided by your financial advisor).

Additional product details (continued)

Periodic fees and expenses (continued)

Other expenses — such as record keeping, accounting, regulatory reporting, audit, legal, custodial, securities lending and other non-investment-related services — are necessary to operate the ACC.

Other things to consider

Certificates are backed by reserves of cash and qualified assets on deposit at the ACC and are not federally or FDIC insured, and include investment risk, including possible loss of principal. The assets backing the certificates have varying ratings and generally increase in market value as interest rates fall and decrease in market value as interest rates rise. These assets have risks, including credit risk, interest-rate risk, prepayment risk and extension risk.

Currently, *Ameriprise*® Certificates can be purchased or sold only through Ameriprise Financial Services, Inc. If you choose to terminate your Ameriprise 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.

Annuities

Annuities are intended to be long-term savings or investing vehicles for your retirement. Annuities generally grow tax-deferred, which means you will not pay taxes on your earnings until you withdraw them. All annuity guarantees are based on the continued claims-paying ability of the issuing insurance company. There are several types of annuities that your Ameriprise financial advisor may offer to you:

Variable annuities

Variable annuities are investment vehicles that help you grow your money, take income in retirement, and pass on your wealth. They offer guarantees that protect your investment for your beneficiaries, and optional benefits for an additional fee that can provide guaranteed income for as long as you need it. The guarantees offered by variable annuities do not apply to the performance of the variable subaccounts, which will vary with market conditions. You may also allocate contract value to an account that earns a guaranteed fixed rate of interest, if available.

Be sure to read the prospectuses (for the variable annuity and underlying funds) provided by your financial advisor before purchasing.

Fixed annuities

Fixed annuities offer a fixed rate of return, which is guaranteed by the issuing insurance company. The rate can fluctuate but will not fall below a guaranteed minimum rate. This type of annuity may be suitable for the conservative portion of your portfolio.

Fixed index annuities

Fixed index annuities protect your principal from market downturns and provide opportunities to grow your money by earning interest based on the performance of an index, using a cap or a spread. With a fixed index annuity, you are not invested in the market. You may also have the option to create guaranteed lifetime income with an optional benefit, available for a fee.

Additional product details

Charges and fees

You may pay a surrender (i.e., withdrawal) charge on a full or partial withdrawal from a variable annuity, fixed annuity or fixed index annuity contract. In some cases, each purchase payment you make to a contract will have its own surrender charge that decreases over a specified period. Your contract may have a withdrawal provision that allows you to take out a portion of your money free of surrender charges. Keep in mind that because of their tax-deferred status, any withdrawals from an annuity prior to age 59½ may also be subject to an additional 10% IRS penalty.

Generally, there are no explicit sales charges for immediate annuities. The payout is based on a fixed rate determined at time of purchase. However, some contracts may offer a commutation option which allows for a lump sum amount which would be discounted (less than the sum of remaining guaranteed payments), and surrender charges may apply.

Periodic fees and expenses

Variable annuity fees and expenses will vary depending upon the annuity product purchased.

- **Mortality and expense and administrative fees** are charged daily against the unit values of the subaccounts and are intended to cover the mortality and expense risks that the insurance company assumes.
- **Contract administration charges** are assessed annually or upon surrender against contracts with less than a stated value and are intended to cover costs associated with establishing and maintaining your contract.
- **Variable annuities provide** optional features or benefits, called riders, that are available for an additional fee. Fees for these riders are either added to the mortality and expense fee or deducted from your contract value annually.

Structured annuities

Most structured annuities offer an indexed linked option with the performance tied to the underlying index. This option usually includes a partial downside protection feature that eliminates a portion of your downside risk. In exchange for this protection performance is usually limited by a performance cap. Generally, index linked strategies with greater downside protection tend to have lower performance caps.

Be sure to read the prospectuses (for the structured annuity and underlying funds, if applicable) provided by your financial advisor before purchasing.

Immediate annuities

Immediate annuities are purchased with a single lump-sum payment and, in exchange, pay a guaranteed income that starts immediately. An immediate annuity may be suitable for retirees who are concerned about outliving their savings and need income right away. Options include payments over a lifetime, a specific period, or a combination of the two, and may also provide benefits to beneficiaries.

- In a **variable annuity**, you indirectly pay the fees and expenses charged by the underlying fund when you choose subaccounts that invest in underlying funds. The types of fees and expenses associated with the underlying funds are similar to those described under “Mutual funds” and are disclosed in the prospectus for each fund. Keep in mind that the funds available through a variable annuity product are not publicly traded retail mutual funds.

Other things to consider

- Variable annuities are insurance products that are complex, long-term investment vehicles subject to market risk, including the potential loss of principal invested. Before you invest, be sure to ask your financial advisor about the variable annuity's features, benefits, risks and fees, and whether the variable annuity is appropriate for you, based upon your financial situation, investment time horizon and objectives.
- Some annuity contracts may be subject to a market-value adjustment that could result in gain or loss of principal when taking a withdrawal.
- When you hold an annuity within a tax-deferred retirement plan, such as an IRA, the annuity does not provide any additional tax-deferred benefit. Consult with your financial advisor or tax adviser regarding additional benefits an annuity may offer. If your annuity is an IRA, you should read *Your Guide to IRAs*.
- Fixed annuities are long-term insurance products. Before you purchase, be sure to ask your financial advisor about the annuity's features, benefits and fees, and whether the annuity is appropriate for you, based on your financial situation and objectives.
- Due to the guaranteed income nature of immediate annuities, there is limited flexibility after purchase.
- Be sure to consult with your advisor on whether the product is appropriate for you.
- The Ameriprise Financial Institutions Group (AFIG) financial advisor channel, for a period of time, will offer certain insurance and annuity products that will only be available for purchase through an AFIG financial advisor, and not available through other Ameriprise Financial Services, Inc. (AFSI) financial advisor channels. These differences reflect the products historically available and the specific needs of bank clients served in the AFIG channel. Other AFSI financial advisors who have clients with a product need beyond the available AFSI product set may refer their clients to an AFIG financial advisor for a recommendation regarding one of these AFIG products. The client would need to open a separate brokerage account through the AFIG channel, complete any other necessary product paperwork and thereafter any ongoing servicing required for that particular purchase would be provided by an AFIG financial advisor. For more information about AFIG, please refer to the “**Client referrals and other compensation**” section of this guide.

Permanent life insurance options

Permanent life insurance options can provide lifetime death-benefit protection when properly funded, and may also offer the opportunity for tax-deferred cash-value growth.

Universal life (UL) — Universal life insurance is a form of permanent life insurance with flexible premiums and a flexible death benefit. This is due to the unbundling of the pricing factors (i.e., mortality, interest and expenses). Policy value is credited daily with a fixed rate of interest.

Indexed universal life (IUL) — IUL has all of the attributes of UL but offers an option for potential policy cash-value growth in addition to the fixed interest account. IUL allows you to allocate a portion of premiums to accounts that credit interest based on the movement of a linked market index or indices. Premiums allocated to indexed accounts are not invested in any stock or equity investment. There is often a maximum “cap” rate of interest that will be credited in exchange for a minimum “floor” interest rate that is guaranteed.

Variable universal life (VUL) — VUL has all of the attributes of UL but offers an option for potential policy value growth in addition to the fixed-interest account by allocating a portion of your premiums to variable subaccounts that invest in underlying funds.

Funds that you allocate to the variable subaccounts will fluctuate in value, depending on the investment performance of the underlying funds.

Before purchasing, be sure to read the prospectuses (provided by your financial advisor) of the variable insurance product and underlying funds.

Whole life (WL) — WL provides a specified death benefit payable to the beneficiary as well as policy value that grows at a guaranteed rate. The premium and death benefit are not adjustable. WL policies may be eligible for dividend credits that can be used to purchase additional insurance, offset future premiums or be received in cash.

Term life insurance — Term life provides a specified death benefit payable to the beneficiary. Term policies generally offer a guaranteed level premium for a specified period of time (e.g., 10, 15, 20 or 30 years) after which the premium will increase annually. Term life policies do not build cash value.

Riders

Life insurance policies may provide optional coverage features, called riders, generally available for an additional charge. Rider charges are either included in policy pricing (WL and Term) or deducted from the policy value (UL, IUL and VUL). Some rider coverage options may include waivers for premiums or policy costs in the event of a disabling injury or illness, coverage for children or an option to access the policy death benefit if the insured incurs costs related to extended care services at home or in a nursing facility.

Sales and surrender charges (UL, IUL, and VUL)

A sales charge is deducted from each premium you pay. A surrender charge may be deducted from policy values if you surrender the policy or if the policy lapses during a specified period of time (e.g., 10, 15 or 20 years after purchase or increase in the coverage amount).

Periodic fees and expenses (UL, IUL, and VUL)

- **Cost of insurance** is deducted from the policy value. This cost is generally based on your gender, age, risk classification and the number of years since the policy was issued. This rate is not guaranteed and may change from time to time as determined by the insurer, subject to maximum guaranteed rates stated in the policy.
- **Policy fees and administrative charges** are deducted from the policy value to cover expenses for underwriting, issuing and maintaining policy records.
- **Mortality and expense risk fees** charged from the policy value are intended to cover the mortality and expense risk that the insurance company assumes.
- **Expenses of underlying funds:** With a variable life insurance policy, you indirectly pay the fees and expenses charged by the underlying fund when you choose subaccounts that invest in the underlying funds. The types of fees and expenses associated with the underlying funds are similar to those described under “Mutual funds” and are disclosed in the prospectus for each fund. Keep in mind that the underlying funds, similar to those available through a variable life insurance product, are not publicly traded retail mutual funds.
- Some indexed account options associated with IUL policies and VUL policies may have an asset based charge for any cash value held in those accounts within the policy.

Other things to consider

- Surrenders, loans and withdrawals may cause a permanent reduction of policy cash values and death benefits; may negate any guarantee against lapse; and may cause the policy itself to lapse.
- If you wish to use your policy for liquidity needs, your options may include a policy loan, a withdrawal from the policy, and a surrender of the policy or a life settlement. Each of these options will have its own benefits and, potentially, certain disadvantages based on your individual needs and circumstances.
- Be sure to ask your financial advisor about the life insurance policy’s features, benefits and fees, and whether the life insurance is appropriate for you, based upon your financial situation and objectives.
- While UL, IUL and VUL policies may provide premium flexibility, policy values must support the deduction of charges, fees and expenses. If policy values do not support these deductions, additional premiums may be required. Certain features may also require that specific premium payment requirements be met.

Life insurance (continued)

Additional product details

- Variable life insurance (VUL) is a complex, long-term investment vehicle that is subject to market risk, including the potential loss of principal invested. Before you invest, be sure to ask your financial advisor about the VUL policy's features, benefits, risks and fees, and whether VUL is appropriate for you, based on your financial situation, investment time horizon and objectives.

Costs and expenses will vary depending on the product purchased.

Other types of insurance

Additional product details

Long-term care insurance

This type of insurance can help protect your assets from expenses associated with assistance with day-to-day activities, adult day care, home health care or nursing home care due to illness or accident in your later years.

Premiums

Your premium covers all costs and expenses associated with a long-term care insurance policy and any riders you may have added.

Other things to consider

- Certain coverage exclusions may apply.
- Be sure to ask your financial advisor about the long-term care insurance policy's features, benefits and premiums, and whether the insurance is appropriate for you based on your financial situation and objectives.
- Premiums on some products are not guaranteed and may increase at a later date.

Disability income insurance

Disability income insurance generally provides monthly income benefits when you are unable to work due to a disabling injury or illness, as defined in the policy.

Premiums

Your premium covers all costs and expenses associated with a disability income insurance policy and any riders you may have added.

Other things to consider

- Certain coverage exclusions may apply.
- Employer-sponsored coverage can be a start, but may fall short of covering all needs.

Medicare Supplemental and group insurance

These types of insurance may be an important consideration in a financial plan because they can help provide protection from medical costs or provide benefits to business employees.

Premiums

Your premium covers all costs and expenses associated with Medicare Supplemental or group insurance.

Other things to consider

- Certain coverage exclusions may apply.
- Premiums may increase upon renewal.

Other products

Additional product details

Bank products and services

Ameriprise Bank, FSB (Bank), an Equal Housing Lender and Member FDIC, will provide access to deposit and lending products or services in addition to personal trust services. Neither you nor Ameriprise financial advisors may suggest, arrange or use mortgage, home equity or other bank loan proceeds to purchase securities or other investment products offered by Ameriprise Financial Services, Inc.

Investment products made available through Ameriprise Financial Services, Inc. are not FDIC insured, are not deposits or other obligations of Ameriprise Bank, FSB and are not guaranteed by Ameriprise Bank, FSB, and are subject to investment risks, including possible loss of principal invested.

Periodic fees and expenses

Charges and fees may apply to deposit products and services in certain instances.

For lending products and services, interest charges and various fees may apply.

For personal trust services, fees include an annual administrative fee and/or an asset-based trust fee based on the amount of assets held in trust. Unique assets held in trust, such as real estate, may have special pricing schedules that apply.

For irrevocable life insurance trusts, fees include an initial setup fee and an annual fixed fee.

For a complete list of fees and charges related to these banking products and services, refer to the appropriate agreement or other offering materials.

Additional product information

Columbia Threadneedle Investment family of Funds

The Columbia Funds are distributed by Columbia Management Investment Distributors, Inc., and may be purchased only from financial institutions authorized by Columbia Management Investment Distributors, Inc. (authorized financial institutions), including Ameriprise Financial and a number of unaffiliated financial institutions.

If you set up an account at an unaffiliated financial institution, you will not be able to transfer Columbia Fund holdings to that account unless that financial institution is an authorized financial institution that has entered into a selling agreement with Columbia Management Investment Distributors, Inc.

If you set up an account with an unaffiliated financial institution that does not have such a selling agreement, you must either maintain your Columbia Fund holdings with Ameriprise Financial or the authorized financial institution; find another authorized financial institution; or sell your shares, paying any applicable contingent deferred sales charge(s) and possibly create a taxable event.

RiverSource® annuities and insurance

Currently, *RiverSource*® variable annuities and immediate annuities are available exclusively through an Ameriprise Financial advisor. *RiverSource* life insurance policies may be purchased only through Ameriprise Financial. *RiverSource* annuities and *RiverSource* life insurance are issued by RiverSource Life Insurance Company and, in New York only, by RiverSource Life Insurance Co. of New York.

If you choose to leave Ameriprise Financial, any *RiverSource* life insurance policy and certain *RiverSource* annuities you purchased through Ameriprise Financial cannot be transferred to your new financial services provider. It may be possible to exchange your policy. Your insurance policy will remain active as long as you continue to make sufficient purchase payments and premium payments directly to the issuing insurance company.

The currently offered *RiverSource*® RAVA series of variable annuities and *RiverSource* AssuredSM fixed index annuities can be transferred to your new financial services provider.

We can appoint a new Ameriprise financial advisor to your contract(s) for servicing, or you may work directly with the Customer Service Department. Remember to always consult a tax adviser regarding possible tax implications for your specific situation.

Some products and services, including variable annuities and life products issued by third parties, are offered by Ameriprise financial advisors. Clients are encouraged to discuss with their advisors the differences in the products and advisor compensation, because some issuers, including RiverSource, may pay higher compensation than others.

Information relating to account ownership

Wherever possible, we treat accounts with multiple owners as an “or” relationship. This means that we will act on transaction requests at the direction of any single named account owner or authorized person.

Information relating to your household

We use information concerning your primary household group’s investment, insurance and annuity products to provide a consolidated statement. A primary household group may consist of an individual client, his or her spouse or domestic partner, and their unmarried children under age 21 who reside at the same address.

For certain products and services, the householding of your accounts may help qualify you for advantageous pricing or fees. Please contact the Customer Service Department at 800.862.7919 if you prefer to receive a statement covering only accounts that you own and not to participate in householding.

Householding also permits us to deliver a single copy of certain shareholder documents — such as prospectuses, supplements, annual reports, semiannual reports and proxies — to clients who own the security and who reside at the same address. To opt out of this service, call 866.273.7429 and reference the client ID located on your statement. Multiple mailings will resume within 30 days of opting out.

Information relating to payments made to Ameriprise for deposit

Checks made payable to Ameriprise 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 our Customer Service Department.

Good Funds

Ameriprise Financial maintains a Good Funds policy in which we apply a hold period on new deposits (ACH, checks, money orders) drawn against external financial services firms (i.e., banks, other broker-dealers, mutual fund companies, insurance companies, etc.). During the hold period, any request to move funds outside of Ameriprise Financial is not permitted. Deposits subject to the Good Funds policy typically become available for withdrawal on the next business day following the hold period. Requests to move funds internally from Ameriprise Financial products to other Ameriprise Financial products may be permitted during the hold period. Ameriprise Financial reserves the right to modify the hold period at its sole discretion. If you have further questions or wish to learn more about the policy, please contact your advisor.

Your financial advisor

Your financial advisor may be authorized to offer or sell products and/or services issued or distributed by Ameriprise Financial Services, Inc., or Ameriprise Certificate Company, Inc. Some products and services may be offered only by certain Ameriprise financial advisors. The products will be traded, distributed or placed through American Enterprise Investment Services, Inc., RiverSource Life Insurance Company, RiverSource Life Insurance Co. of New York and certain pre-approved, but unaffiliated, life insurance and fixed-annuity manufacturers. This broad range of products and services is designed to help you meet your individual financial objectives.

Your financial advisor assigned to your account(s) may be licensed in a state as:

- An insurance producer, which entitles your financial advisor to offer and sell insurance and fixed annuities
- A broker-dealer agent, which entitles your financial advisor to offer and sell face-amount certificates, mutual fund shares, alternative investments, structured products, preferred securities, unit investment trust interests, variable annuities, variable life insurance, stocks, bonds and other general securities
- A real estate broker or salesperson, which entitles your financial advisor to offer and sell real-estate interests
- An investment adviser representative, which entitles your financial advisor to offer and sell financial planning and advisory accounts services on behalf of Ameriprise Financial Services, Inc.

Our company and how we get paid

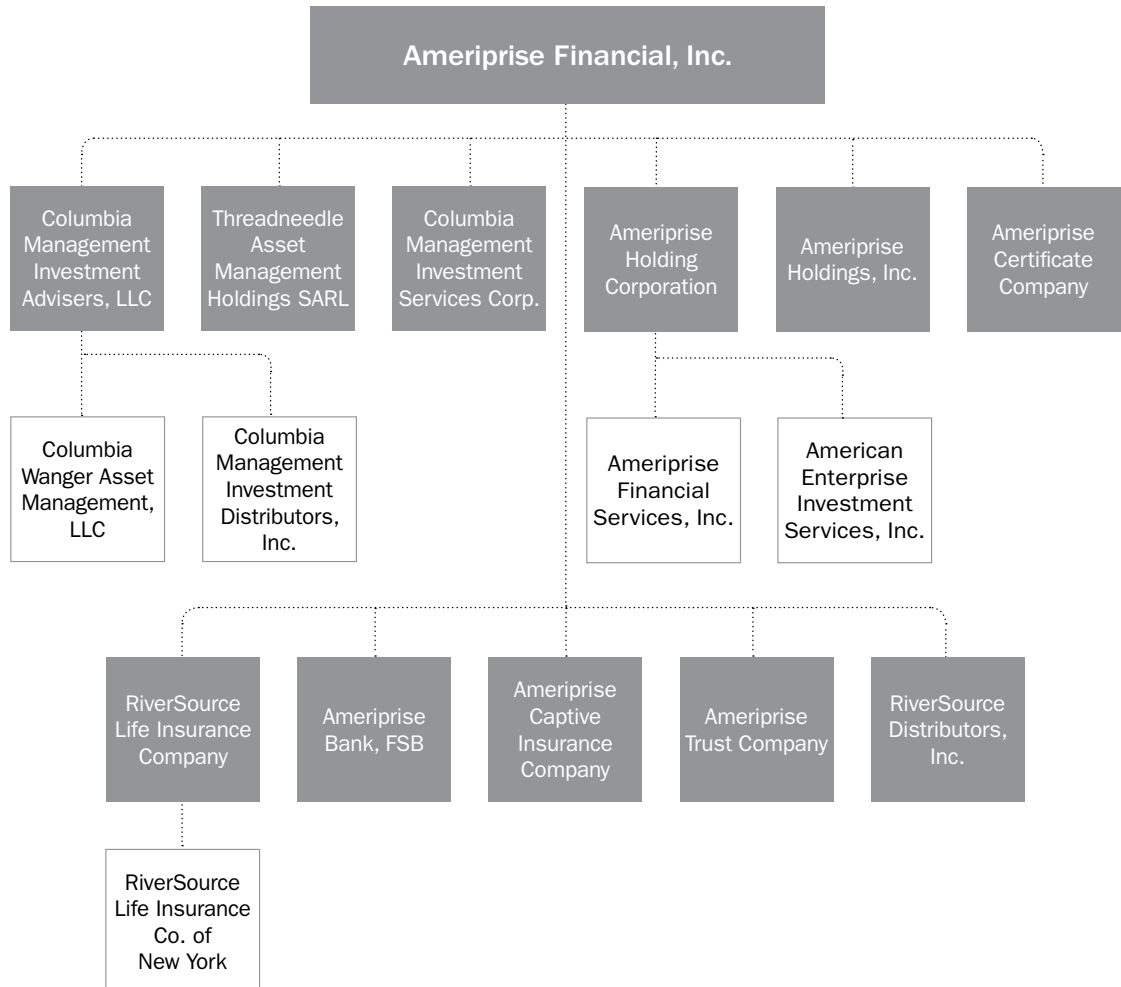
Our company

To help you understand the relationship among the Ameriprise Financial, Inc., companies and to describe how we get paid, our corporate structure is outlined below.

You have become a client of Ameriprise Financial Services, Inc. Many of our affiliates provide products that you may have the opportunity to choose from or will provide services to you over the course of your relationship with us (e.g., *RiverSource*® annuities and *RiverSource* insurance products are issued by RiverSource Life Insurance Company and, in New York only, by RiverSource Life Insurance Co. of New York).

Depending on the products and services you choose, you may receive account statements or other correspondence from these companies. As you read further, “we,” “our” and “us” refer to Ameriprise Financial Services, Inc.

The Threadneedle group of companies constitutes the international investment platform for Ameriprise Financial, Inc. The group consists of wholly owned subsidiaries of Ameriprise Financial, Inc., and provides services independent from Ameriprise Financial Services, Inc., including the Ameriprise Financial Services, Inc., broker-dealer business.



How we get paid

Ameriprise Financial and its affiliates receive revenue from several different sources on the products and services you purchase. These sources include the fees and charges 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. Further on in this section you will find information on how our financial advisors are paid.

Cost Reimbursement Services and Third Party Payments.

Payments from product companies

AEIS will receive the following types of payments with respect to the investment products we recommend and you select for the investment of your applicable managed account assets. This compensation is used in part to fund the cost of providing the services, maintaining managed accounts and offering an investment platform for our clients as well as providing revenue and net earnings to AEIS. For qualified SPS Advisor accounts and trustee-directed retirement plans in qualified SPS *Advantage* accounts, AEIS either does not collect Third Party Payments or credits them back to client accounts.

AEIS performs, for the benefit of Ameriprise Financial, its financial advisors and clients, certain services, 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, websites and mobile applications (collectively “cost reimbursement services”).

AEIS also receives revenues that exceed the costs of the cost reimbursement services provided. These revenues include revenue sharing and marketing support payments (as described below under the heading “Education, training, seminar reimbursement and noncash compensation”) and such payments increase the gross revenues and net earnings of AEIS.

The cost reimbursement payments received by AEIS are paid by some but not all product sponsors out of assets of the investment, such as a mutual fund or unit investment trust, and thus reduce the investor return on their investment. Because not all investments provide

for cost reimbursement payments, Ameriprise Financial has an incentive to recommend or select such products within managed accounts to increase the revenues of its affiliate AEIS, which represents a conflict of interest.

AEIS receives a variety of payments for cost reimbursement services from proprietary products sponsored or managed by affiliated investment advisers (e.g. Columbia Management) and by nonproprietary investment product companies which reimburse the costs of client beneficial services provided by Ameriprise Financial and AEIS. The most significant of these payments are reimbursement for marketing support received from the product companies. AEIS receives cost reimbursement payments from product companies for the following products: mutual funds, 529 plans, UITs, non-traded REITs, real estate private placements, tax-deferred real estate exchanges, non-traded BDCs, variable annuities, structured products, managed futures funds, private equity offerings, non-traded closed end funds and hedge fund offerings. Ameriprise Financial receives cost reimbursement payments on our affiliated and unaffiliated annuity products which are not eligible investments for managed accounts. These payments are discussed in the remaining paragraphs of this section.

If AEIS and its affiliates did not receive this compensation, Ameriprise Financial would likely charge higher fees or other charges to clients for the services provided. When evaluating the reasonableness of the fees and expenses incurred in a managed account, you should consider not just the wrap fee, but also the fund-level fees and other compensation that Ameriprise Financial and its affiliates receive, including payments for cost reimbursement services described in this section and other cost reimbursement and marketing support payments received by us and our other affiliates, as described in the “**How we get paid**” and the “**Revenue Sources for other Ameriprise Financial, Inc. companies**” sections of this guide as applicable.

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 here as the Ameriprise Financial Mutual Fund Program (“Mutual Fund Program”) within the nearly 300 mutual fund families Ameriprise Financial offers.

The goal at Ameriprise Financial is to offer a wide range of mutual funds using the following criteria:

- Product breadth and strong-performing funds
- Financial strength of the firm

- Marketing and sales-support payments paid to our affiliate AEIS to support cost reimbursement services
- Ability to provide product support and training to our financial advisors
- Tax benefits offered by individual states
- Overall quality of the 529 plan (specific to 529 plans)

Ameriprise financial advisors may offer, and clients are free to choose, mutual funds from nearly 150 firms available. However, certain aspects of the Mutual Fund Program create a conflict of interest or incentive if Ameriprise Financial promotes, or Ameriprise financial advisors recommend, the mutual funds offered by a firm participating in the Mutual Fund Program versus mutual funds offered by nonparticipating firms. As further described below, these conflicts and incentives arise from the cost reimbursement related to Education, Training, Seminar Reimbursement and noncash compensation, as more fully discussed below, provided to our financial advisors by, as well as the payments AEIS receives from, firms participating in the Mutual Fund Program and with other relationships with firms, including Columbia Management; see the section titled “**Columbia Funds**” below. Ameriprise Financial 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.

To be included in the Mutual Fund Program, firms have agreed to pay AEIS a portion of the revenue generated from the sale and/or management of mutual fund shares. Full Participation Firms make cost reimbursement payments at a higher level than do firms that have arrangements discussed in the “**Other financial relationships**” section. For each year a client holds shares of a particular mutual fund, the mutual fund’s advisor or distributor may pay to AEIS an amount based on the value of the collective mutual fund shares held in clients’ accounts (asset-based payment). AEIS receives an asset-based payment (up to 0.20% per year for mutual funds and 0.185% per year for 529 plans) on some or all of Ameriprise Financial clients’ assets managed by the participating firms. Certain Full Participation Firms’ mutual fund share classes may pay AEIS more marketing support for certain types of mutual funds. As a result, Ameriprise financial advisors may have an indirect incentive to sell such funds.

If your managed account sweeps uninvested cash to a money market mutual fund, AEIS receives cost reimbursement payments of up to 0.42% of the amount held in your money market fund Sweep Option. The

amount that AEIS receives may be reduced based on fee waivers that are imposed by the money market fund firm.

These arrangements vary between firms and may be subject to change or renegotiation at any time. If a firm ceases to make cost reimbursement payments, AEIS may remove the firm from the Mutual Fund Program and Ameriprise Financial may cease to offer mutual fund shares and or the 529 plan(s).

Full Participation. Thirty firms fully participate in the Mutual Fund Program. These fund firms include Columbia Management, Allianz Global Investors, American Century, BlackRock, Delaware Investments, Dreyfus, DWS Investments (formerly Deutsche Asset & Wealth Management), Eaton Vance, Federated, Fidelity, First Eagle, Goldman Sachs, Invesco, Ivy, Janus Henderson Investors (formerly Janus), John Hancock, JP Morgan, Legg Mason, Lord Abbett, MainStay, MFS, Natixis, Neuberger Berman Management LLC, Nuveen, Oppenheimer, PGIM Investments (formerly Prudential), Principal, Putnam, Virtus and Wells Fargo. These firms are referred to as “Full Participation Firms.”

We offer 529 plans from 22 firms. Of those firms, 14 are Full Participation Firms. These fund firms include Allianz Global Investors, American Century, BlackRock, Columbia Management, Fidelity, Invesco, Ivy, John Hancock, J.P. Morgan, Legg Mason, MFS, Nuveen, Oppenheimer and Putnam. Each of these firms is referred to as a “Full Participation Firm.”

The most current Mutual Fund Program information, as well as the previous calendar year’s totals of marketing support payments received from Full Participation firms, in addition to distribution support amounts, may be viewed online by visiting www.ameriprise.com/funds and clicking on “An Investor’s Guide to Purchasing Mutual Funds and 529 Plans at Ameriprise Financial”.

Education, Training, Seminar Reimbursement and non-cash compensation. Full Participation Firms provide to Ameriprise financial advisors, and in some cases their clients, education, training, and support services relating to the investment products they offer. These firms may reimburse Ameriprise Financial and Ameriprise Financial may subsequently reimburse Ameriprise financial advisors for client/prospect education events and financial advisor sales meetings, seminars and training events consistent with Ameriprise Financial policies. Ameriprise Financial and its financial advisors may also receive nominal noncash benefits from time to time. As a result, Ameriprise financial advisors may have a greater familiarity with and an incentive to sell investment products of Full Participation Firms.

Other financial relationships

Distribution Support Relationships. AEIS also has cost reimbursement arrangements with firms for distribution support services. These firms make cost reimbursement payments to AEIS of up to and 0.10% on assets for these services, which support the distribution of the fund's shares and 529 plans by making them available on one or more of Ameriprise Financial platforms. In addition, certain mutual funds' distributors pay a fee to AEIS of up to 0.10% for cost reimbursement services provided for the mutual fund shares purchased during a given period (sales-based payment). These 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.

Ameriprise Financial sells 529 plans from five firms that do not make cost reimbursement payments to AEIS. Moreover, plans offered by these firms are available for sale to in-state residents only. Those firms are: American Funds, Ascensus, First National Bank of Omaha, NorthStar Financial and Union Bank & Trust. In addition, Connecticut and Iowa restrict the sale of their state plans, offered by Harford and Voya, respectively, to in-state residents only. Certain 529 plans may pay AEIS a fee of up to 1% assets for NAV rollovers.

The mutual fund's distributor or affiliate may also make payments to AEIS for networking and/or omnibus support and other client services and account maintenance activities. AEIS will also receive sub-transfer agency fees with respect to investments you make in affiliated and non-affiliated mutual funds. These fees vary depending on the mutual fund family and on whether the mutual fund keeps a separate record for each account (i.e., networked accounts) or relies on AEIS's recordkeeping (i.e., omnibus accounts). 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 the case of no-load fund families for which AEIS has a direct relationship, the compensation for sub-accounting, administrative and distribution support services are bundled into one asset-based fee of generally up to 0.35% (which may include up to a 0.25% service fee) annually of the value of shares held in an Account.

Ameriprise Financial also provides clients with access to mutual funds offered by other firms through the

relationship AEIS has with Charles Schwab & Co., Inc. ("Schwab"), and Schwab's mutual fund program. AEIS receives an asset-based fee of up to 0.40% per year on some or all of Ameriprise Financial clients' assets managed by participating mutual fund firms.

AEIS and its affiliates may have other relationships with firms whose mutual funds Ameriprise Financial offers. These relationships may include affiliates of firms acting as a sub-adviser to CMIA, CMIA acting as a sub-adviser to a third party firm, or affiliates of a firm managing an investment portfolio within another Ameriprise Financial or affiliated product, such as a RiverSource variable annuity. Firms may use CMIA to manage an underlying investment option in products offered through the Mutual Fund Program.

AEIS has a marketing support agreement with BlackRock Advisors, LLC with respect to mutual fund positions held by Ameriprise Financial customers. BlackRock, Inc. owns more than 5% of the outstanding shares of Ameriprise Financial, Inc. stock.

Columbia Funds. Columbia Management Investment Distributors, Inc. ("Columbia Management Investment Distributors"), an indirect wholly-owned subsidiary of Ameriprise Financial, Inc., is a registered broker-dealer, serving as principal underwriter and distributor of registered open-end investment companies and other funds advised by affiliated companies, Columbia Management Investment Advisers, LLC ("CMIA") and Columbia Wanger Asset Management, LLC, ("Columbia Wanger Asset Management") (collectively, "Columbia Management" or "Columbia"). These investment companies are collectively referred to as the "Columbia Funds." AEIS and other affiliates of Ameriprise Financial provide certain administrative and transfer agent services to the Columbia Funds. Ameriprise Financial and its affiliates generally receive more revenue from sales of affiliated mutual funds than from sales of other mutual funds. Employee compensation and operating goals at all levels of the company 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.

American Funds. For both affiliated and unaffiliated mutual funds we offer, AEIS receives cost reimbursement payments from mutual fund firms of up to 0.20% of assets invested in those funds. With most mutual fund firms, these payments are paid on an ongoing basis and determined solely based on total assets invested in the funds of a particular fund family held in clients' accounts. 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 the prospectus governing each mutual fund. This platform fee will not exceed 0.20% of assets, nor will it exceed the limits set forth in the prospectus governing each fund. You can find the total dollar amounts we receive annually from American Funds, as of the previous calendar year, by visiting www.ameriprise.com/funds and clicking on "An Investor's Guide to Purchasing Mutual Funds and 529 Plans at Ameriprise Financial." American Funds Class F2 shares are available for purchase in SPS *Advantage* and SPS Advisor accounts. Clients may transfer in existing positions of Class A, C, F1 or F2 shares to Ameriprise Brokerage accounts and continue to make add-on purchases to existing brokerage positions; however, no new purchases are allowed in brokerage. Clients have the ability to exchange between eligible American Funds.

Payments from other nonproprietary product companies

Payments from hedge fund offering sponsors. AEIS, in consideration for its cost reimbursement services, may receive ongoing investor service fee payments from hedge fund offering sponsors available in Ameriprise brokerage accounts. Depending on the fund, AEIS will receive payments ranging from 0% to 0.25% of the amount you invest in this product.

Payments from UIT sponsors. 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 and our financial advisors 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 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.

AEIS will receive compensation from UIT sponsors whose products we recommend, in the form of volume concessions that range from 0.035% up 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.

Payments from insurance companies. Cost reimbursement payments are received by Ameriprise Financial and/or its affiliate, AEIS, from affiliated and unaffiliated insurance companies. Ameriprise Financial sells annuity and insurance products to its clients manufactured by its affiliate, RiverSource, as well as from select unaffiliated insurance companies. Commissions payable to your financial advisor for variable annuity sales are equivalent among RiverSource and the unaffiliated insurance companies for comparable annuity products. Commissions payable on insurance products varies by manufacturer and product.

RiverSource and potentially other unaffiliated insurance companies may be permitted to reimburse Ameriprise Financial 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 and AEIS policies, as applicable. These companies also provide support to an Ameriprise Financial internal sales desk, which in turn provides support to financial advisors. As a result, Ameriprise financial advisors may have a greater familiarity with RiverSource annuity products and the unaffiliated insurance companies who provide added educational support.

These unaffiliated variable annuity and insurance companies 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 may have a greater familiarity with RiverSource annuity products.

From unaffiliated long-term care insurance product manufacturers, AEIS receives payments up to 27.5% of the commissionable premium. AEIS receives varying payments from unaffiliated life, disability and other insurance product manufacturers.

Payments from structured products sponsors. AEIS receives cost reimbursement for the sale of structured products. Depending on the product, AEIS will receive payments between 0.25% and 0.60% of the amount you invest multiplied by the product's term. For example, a structured note with a three-year term and a 0.40% payout could have an upfront payment of 1.2% (three years x 0.40%).

Payments from managed futures fund sponsors.

Depending on the fund, AEIS receives cost reimbursement payments of up to 0.25% of the amount you invest in this type of product.

Payments from private equity offering sponsors.

AEIS receives ongoing investor services fees for the sale of private equity offerings.

Payments from non-traded closed end fund sponsors.

AEIS receives cost reimbursement payments of up to 2.5% of assets in non-traded closed end funds.

Payments from non-traded REIT, real estate private placement, tax-deferred real estate exchange and non-traded BDC sponsors.

AEIS receives cost reimbursement payments of up to 2.50% of assets in non-traded REITs, real estate private placements, tax-deferred real estate exchange and non-traded BDCs.

Mutual Funds & ETFs Available to Investment Managers

Investment managers that construct investment strategies utilizing mutual funds and ETFs may utilize any mutual fund or ETF available for sale in our managed accounts, provided the fund selected meets operational and other requirements designed to facilitate transaction execution and ensure timely order processing. Ameriprise Financial does not require investment managers to limit the mutual funds and ETFs utilized to only those that a financial advisor may recommend to a client in an SPS Advantage or SPS Advisor account or for a nondiscretionary mutual fund or ETF transaction in an Investor Unified Account or Vista Separate Account. Mutual funds and ETFs available for financial advisor recommendations are subject to initial and ongoing due diligence by the Investment Research Group (IRG) based on a quantitative and qualitative process. Investment managers are responsible for conducting their own independent due diligence and research on the mutual funds and ETFs utilized in constructing an SMA investment strategy or model portfolio available through managed accounts. This may result in an investment manager reaching a different opinion for a particular mutual fund or ETF than the opinion of the IRG on that same investment. The IRG conducts initial and ongoing due diligence on investment managers available through managed accounts and provides recommendations to the Managed Accounts Program Oversight Committee on matters including due diligence findings that could result in a recommendation for termination. Mutual funds meeting the operational and other requirements noted above primarily consist of mutual funds from Full Participation Firms. AEIS receives cost reimbursement payments from the fund

family when investment managers select mutual funds from Full Participation Firms for an investment strategy. The amount of any cost reimbursement payments AEIS receives from mutual fund firms is not considered in determining which funds are available to investment managers. Investment managers do not have access to information on which mutual funds are offered by Full Participation Firms or the rate of reimbursement a Full Participation Firm pays AEIS for cost reimbursement services.

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, and mutual funds contained on the Starting Point List may not be equally available across both managed accounts and Ameriprise brokerage accounts. All ETFs available for sale at Ameriprise and all mutual funds offered by Full Participation Firms or Available for Sale Firms, as further discussed below, must meet Ameriprise Financial due diligence standards to be eligible for inclusion on the Starting Point List. In developing the Starting Point List, the IRG applies a quantitative and qualitative evaluation process that includes an analysis of a fund's returns, risk and expenses; the tenure and quality of the investment team; the soundness of the process and consistent implementation; and the overarching health of the organization. Certain mutual funds and ETFs that would have otherwise been included on Starting Point were excluded due to their high investment minimums. Client suitability must be considered when trading mutual funds and ETFs, including breakpoint discount eligibility and NAV transfer ability. The funds on the Starting Point List are subject to change periodically; however, changes to the Starting Point List should not be the sole reason to prompt trading.

The Starting Point List is developed by the IRG based on eligibility criteria established by Ameriprise Financial. Approximately 2,200 mutual funds are eligible for inclusion on the Starting Point List. The universe of ETFs includes funds available for sale at Ameriprise. The 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.

While the Starting Point List is developed by evaluating the performance characteristics of each fund's Class A shares, the analysis is ultimately intended to apply at the mutual fund level. Mutual funds included on the Starting Point List may or may not offer an Advisory Share class that is available in our managed accounts. As a result, managed account clients may be unable to purchase a fund on the Starting Point List if that fund does not offer an Advisory Share class. Similarly, Ameriprise brokerage account clients may be unable to purchase a mutual fund on the Starting Point List if that fund does not offer a share class available in Ameriprise brokerage accounts. In addition, some mutual funds included on the Starting Point List may offer lower-cost share classes than the Advisory Share class available in managed accounts. You should consider whether you may be eligible to purchase these lower-cost share classes outside of our managed accounts.

These eligibility criteria are designed by Ameriprise Financial to primarily include, and therefore favor, mutual funds from Full Participation Firms. To be included in the Program and be eligible for inclusion on the Starting Point List, 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 further described above.

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. The payments made to AEIS by Full Participation Firms and Available for Sale Firms reimburse the costs of client beneficial services provided by Ameriprise Financial and AEIS to financial advisors and clients, including but not limited to, distribution, marketing, administration and shareholder servicing support, due diligence, training and education, and other support related functions (e.g., Cost Reimbursement Services) and increase the revenues and profitability of AEIS. The most significant of these payments are reimbursement for marketing

support received from Full Participation Firms and other product companies. 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. 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 regardless of whether that funds 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 to promote (and for Ameriprise financial advisors to recommend) one fund over another fund is provided on our website at ameriprise.com/funds and click "Purchasing Mutual Funds Through Ameriprise."

Revenue sources for Ameriprise Financial Services, Inc.

Financial planning and advisory service fees. These are fees you pay for financial planning and fee-based investment advisory account services, respectively.

Ameriprise brokerage account sales charges. Sales charges, commissions and/or selling concessions are paid when you buy or sell equities and fixed income products including corporate bonds and municipal securities, mutual funds, 529 plans, stocks and bonds, closed-end funds, preferred securities, UITs, non-traded REITs, non-traded BDCs, non-traded closed-end funds, hedge fund offerings, exchange funds, private equity offerings, managed futures funds, real estate private placement offerings and structured products. In addition, you may pay a markup or markdown in bond transactions executed on a principal capacity with AEIS. These charges vary by product and product type. For example, with respect to mutual funds, the sales charge for a stock mutual fund is typically greater than that for a bond mutual fund. For other product types, such as non-traded REITs, the sales charge you pay may also include a portion of the distribution, organization and offering fees and expenses.

Periodic fees. Periodic fees include 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 offers programs that may result in reimbursement to client accounts for certain periodic fees. These programs do not apply to managed accounts. In our client loyalty program, Ameriprise Achiever Circle, 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 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 may be reimbursed.

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

Periodic expenses. Periodic expenses are paid from product assets, such as 12b-1 shareholder servicing fees paid from mutual fund assets (including 12b-1 fees paid on certain funds that serve as underlying investment options for 529 plan assets) and distribution fees paid from Ameriprise certificate assets. 12b-1 shareholder servicing fees assessed in Ameriprise brokerage accounts may be used to pay for marketing, distribution and shareholder service expenses. Any 12b-1 shareholder servicing fees received for Non-Advisory Share classes in any managed accounts will be rebated to clients.

Interest. If you request a margin account, AEIS charges you interest on your margin balance.

Ameriprise Financial may refer clients to certain third-party lenders for extension of credit secured by assets held in their Ameriprise Financial accounts. We will receive compensation from these lenders based on the amount of credit extended and the interest rate of the loan to our clients.

Payments from managed futures fund sponsors.

Ameriprise Financial receives selling commissions for the sale of managed futures funds.

Payments from exchange fund sponsors. Ameriprise Financial may receive a fee of up to 1% of the value of the exchange fund shares purchased.

Payments from non-traded closed-end fund sponsors.

Ameriprise Financial receives selling commissions for the sale of non-traded closed-end funds. Ameriprise Financial may receive fees of up to 6.0% of the amount invested.

Payments for referrals to structured settlements agents. Ameriprise Financial 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 receives a fee comprised of a selling concession, management fee, 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. The specific amounts vary by individual offering, and are disclosed in the prospectus.

Transaction charges. Ameriprise Financial does not assess online transactions charges in managed accounts to financial advisors. Franchisee financial advisors are assessed a transaction charge if entering an order by phone for SPS *Advantage* or SPS Advisor accounts. For employee financial advisors, this transaction charge is assessed to the employee's branch and not paid by the advisor. Direct payment by the financial advisor of phone-in transaction charges may be a disincentive for a franchisee financial advisor to recommend an SPS *Advantage* or SPS Advisor account or to recommend trades in the account(s).

For managed accounts, Ameriprise financial advisors pay the same mutual fund transaction rate for orders entered by phone for all mutual fund firms. Not all mutual fund families are available for purchase in a managed account. For more information about payments and potential conflicts of interest, please see the applicable prospectus, term sheet, application or other client disclosure forms.

Financial interest in products. Ameriprise Financial has a financial interest in the sales of proprietary products that are manufactured by its affiliates. Ameriprise Financial and its affiliates receive more revenue from the sale of some financial products and services, particularly those products and services sold under the Ameriprise, Columbia Threadneedle Investments and RiverSource brands, than for the sale of other products and services.

Generally, Ameriprise Financial receives more revenue for securities or products sold in a fee-based account than for those sold with only a sales charge or commission. Higher revenue generally results in greater profitability for Ameriprise Financial. Employee compensation (including management and field leader compensation) and operating goals at all levels of

the company are tied to the company's success. Management, sales leaders and other employees generally spend more of their time and resources promoting Ameriprise, Columbia Threadneedle Investments and RiverSource branded products and services.

Any 12b-1 fees received by Ameriprise Financial for mutual funds held in any managed accounts will be rebated to clients, and financial advisors do not receive compensation from 12b-1 fees assessed on mutual funds held in managed accounts. For brokerage accounts, both Ameriprise Financial and individual financial advisors are compensated when clients buy mutual funds through Ameriprise Financial. 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. Sales charges and 12b-1 fees vary from mutual fund to mutual fund and from class to class. Ameriprise Financial and the financial advisor receive more compensation on fund or share classes that pay higher fees.

Ameriprise Financial and the financial advisor generally receive less compensation when the sales charge and/or 12b-1 fee is reduced, waived completely, or where there is no sales charge or 12b-1 fee. Therefore, for brokerage accounts there is an incentive for our financial advisors to sell a fund that pays a load or a fund that pays a 12b-1 fee over funds that do not.

Ameriprise Financial and Ameriprise financial advisors are paid in different ways for helping you choose mutual funds, depending on the type of fund, amount invested, and share class purchased. Financial advisors receive compensation from 12b-1 fees for mutual funds in brokerage transactions only. Ameriprise Financial and financial advisors receive more compensation for sales of certain types of products, such as insurance, rather than for others.

Economic benefits of affiliates' products and services

As with all financial services firms, a portion of our revenue and compensation can generate a profit for the firm. The revenue and compensation we receive helps us cover our expenses in providing and servicing these products and services. Employee and financial advisor compensation and operating goals at all levels of Ameriprise Financial, Inc. are tied to the success of its businesses. As a result, certain incentives and

conflicts of interest may exist for Ameriprise Financial, our affiliates and our financial advisors if you purchase certain products or services recommended by your financial advisor.

Generally, among other things, Ameriprise Financial and our affiliates will receive:

- More revenue, in aggregate, from the purchase of products sponsored or managed by Ameriprise, Columbia Management and RiverSource ("proprietary products") than from the purchase of products sponsored or managed by firms that aren't affiliated with Ameriprise Financial, Inc. ("nonproprietary products"). Ameriprise Financial actively promotes the products of our affiliates through advertising, direct mail, and product support and training events.
- More revenue from the purchase of products and services than from wrap fees.
- More revenue as the size of any margin account balance increases.
- More revenue when you purchase certain types of products, such as insurance and annuity products and direct investments.
- More revenue from products and services that generate ongoing revenue streams, such as mutual funds that pay ongoing 12b-1 fees, an investment advisory account service, and life insurance and annuity products with mortality and expense charges.
- More revenue when you purchase shares of mutual funds or 529 plans from Full Participation Firms than from firms with other distribution support relationships, as described in the "**Cost Reimbursement Services and Third Party Payments**" section of this guide.
- More revenue when you purchase investment products for which we receive cost reimbursement payments or have similar financial arrangements, as described in the "**Cost Reimbursement Services and Third Party Payments**" and "**Revenue sources for Ameriprise Financial, Inc.**" sections of this guide.
- Less revenue when a sales charge or commission is reduced or waived completely, or where there is no sales charge.
- More revenue when you move assets (including retirement plan accounts) from another institution to Ameriprise Financial or RiverSource or into a product managed by Columbia Management or another affiliate.

Generally, among other things, your financial advisor may earn:

- More depending on how your financial advisor is affiliated with Ameriprise Financial, as described in the **“How our financial advisors get paid”** section of this guide.
- More on the sale of certain life and disability insurance products because insurance companies pay increasing levels of compensation the more a financial advisor sells.
- More on the purchase of annuity and insurance products and direct investments, because they are more complex than are other products and take more time to service.
- More revenue from products and services that generate ongoing revenue streams, such as mutual funds that pay ongoing 12b-1 fees, an investment advisory account service, and life insurance and annuity products with mortality and expense charges.
- More from certain sales incentive programs to increase overall assets under management.
- Less on individual purchases within a transaction-based brokerage account because of the higher transaction charges your financial advisor pays on these accounts compared to a fee-based investment advisory account.
- Less when a sales charge or commission is reduced or waived completely, or where there is no sales charge.
- Typically, 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.
- More revenue if you purchase securities on margin that you could not otherwise purchase in a cash account.
- Nominal additional compensation on the value of the assets rolled into an IRA brokerage account from a retirement account with Columbia Funds.
- A higher payout rate based on the level of product sales, on the number of financial plans sold, and on higher face/death benefit amount for certain insurance products.
- More when you move accounts (including retirement plan accounts) from another institution to Ameriprise Financial, CMIA or RiverSource.

- Compensation for servicing trust accounts held with the Bank.
- No compensation for the renewal of *Ameriprise* certificates.

Financial advisors are required to take training on complex products developed by Ameriprise Financial and its affiliates and non-affiliated product manufacturers, including certain RiverSource products prior to soliciting, including RiverSource insurance and RiverSource annuity products and a targeted subset of nonproprietary products. Additional general product training is available and specific product training is required for a number of complex products, including Columbia Threadneedle Investments and RiverSource branded products. It is likely that a product recommendation from your financial advisor will be drawn from the universe of products on which they were trained. Ameriprise Financial may enter into strategic alliances with companies that offer products or services that Ameriprise Financial and its financial advisors do not sell. In some of those alliances, Ameriprise financial advisors may receive gifts and non-cash compensation from the other companies which are subject to SEC and FINRA regulations as well as Ameriprise Financial internal compliance policies.

Some, but not all, of the financial planning software tools available for use by your financial advisor were developed by Ameriprise Financial or unaffiliated third parties and may make it more convenient for your financial advisor to select proprietary products.

Most Ameriprise financial advisors are also the appointed agents of RiverSource Life Insurance Company and, in New York only, RiverSource Life Insurance Co. of New York, affiliates of Ameriprise Financial.

Ameriprise Financial grants RiverSource limited access to Ameriprise financial advisors and provides RiverSource with limited information related to Ameriprise clients to promote sales of RiverSource products and to assist financial advisors in understanding the features and benefits of those products. Ameriprise Financial does not grant this access to other non-affiliated companies offering similar products, thus they do not have the same access to financial advisors as RiverSource.

Additionally, it is possible that the Bank would send an order on behalf of a trust account to AEIS and at the same time AEIS would execute the opposite order for a brokerage client. Investments may be made for the Bank's trust accounts in which Ameriprise Financial or its related persons have a position or interest.

Although Ameriprise Financial and its related persons may own securities suitable for or held by clients, in no case will holdings of Ameriprise Financial, Inc., its subsidiaries or their employees or directors be directly sold to or purchased from the Bank's trust accounts. AEIS, an affiliate of Ameriprise Financial, may buy or sell for its own account securities that Ameriprise Financial may recommend for the Bank's trust accounts. Ameriprise Financial does not anticipate that conflicts of interest will arise because we have adopted policies and procedures prohibiting Ameriprise Financial and our related persons from engaging in trading activity that creates a conflict of interest with our clients as discussed in the **"Code of Ethics, Participation or Interest in Transactions and Personal Trading"** section.

How our financial advisors get paid

An Ameriprise financial advisor is assigned to every investment advisory service. Ameriprise financial advisors have a wide range of business and educational backgrounds. They are required to have appropriate licenses and registrations to transact business, including Financial Industry Regulatory Authority ("FINRA") registration, required state securities and insurance licenses and, where required, a state investment adviser registration.

Many financial advisors hold advanced academic degrees and/or professional designations and certifications, including the CERTIFIED FINANCIAL PLANNER™ certification. In addition, ongoing training is available to financial advisors. **For additional important information about an advisor check FINRA BrokerCheck at finra.org/brokercheck or call 1.800.289.9999.**

Your financial advisor earns a living by providing you with financial advice and product recommendations to suit your goals. 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 and they do not receive a salary from us.
- **Employee financial advisors.** These financial advisors are employed by Ameriprise Financial.
- **Associate financial advisors.** These financial advisors are employed by or contract with the independent contractor franchisees and they do not receive

a salary or other compensation from Ameriprise Financial.

- **Bank employee financial advisors.** These AFIG 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 AFSI. The financial institution serves as paying agent on our behalf for such compensation in accordance with applicable law. Bank 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 over time.

Salary

In addition to the fees described below, employee financial advisors may receive a salary or wage from Ameriprise Financial. 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.

Wrap Fees and Compensation

The wrap fee you pay is shared between Ameriprise Financial and your financial advisor as further described below. A portion of the wrap fee, including applicable financial planning service and advisory service fees, is paid to your financial advisor for introducing you to the service, gathering the information necessary to prepare your service, helping you establish needs and goals, preparing and presenting your service, and/or providing financial advice on behalf of Ameriprise Financial.

The remaining portion of the wrap fee goes to Ameriprise Financial for the supervisory, technical, administrative and other support that is provided to all financial advisors, as further discussed in the **"Fees and Compensation"** section. The portion of wrap fees retained by Ameriprise Financial differs by type of managed account.

Currently, for Managed Accounts that have not converted into the Updated Pricing Framework, you negotiate a single Asset-based Fee that includes any investment management fees charged by the Advisory Service Provider providing advisory services to any SMA investment strategies you select for

your Managed Account. Currently, these investment management fees do not raise or lower the total amount of your Asset-based Fee; they do, however, affect the remaining portion of the Asset-based Fees retained by Ameriprise Financial Services. Within the Vista Separate Account, Investor Unified Account and Access Account Programs, the portion of Asset-based Fee retained varies depending on the Advisory Service Provider and investment strategy you select. As a result, currently, Ameriprise financial advisors receive a larger portion of the Asset-based Fee from certain types of Managed Account Programs, and, within the Vista Separate Account, Investor Unified Account and Access Account Programs, more for certain Advisory Service Providers and investment strategies. This may create an incentive for your financial advisor to recommend one Managed Account Program over another or a particular Advisory Service Provider and investment strategy over another.

Ameriprise Financial Services plans to eliminate this incentive by transitioning all Managed Accounts to the Updated Pricing Framework throughout the remainder of 2019. For Managed Accounts that have converted into the Updated Pricing Framework, the Manager Fee sub-component of the Asset-based Fee is separately itemized, compensates the Advisory Service Provider and will not affect the portion of the Asset-based Fee received by Ameriprise Financial Services or your financial advisor.

From time to time, an Advisory Service Provider's investment strategy that is currently available through Envestnet in the Vista Separate Account Program may become available in our Select Separate Account Program. For Select Separate Accounts, each Advisory Service Provider enters into a master investment advisory agreement with Ameriprise Financial Services and we pay the Advisory Service Provider a portion of the Asset-based Fee, referred to as the Manager Fee in the Updated Pricing Framework, for its investment management services. For Vista Separate Accounts that are available through Envestnet, each Advisory Service Provider enters into a sub-management agreement with Envestnet, and Envestnet pays the Advisory Service Provider directly for their investment management services. As a result, the same Advisory Service Provider may earn more or less in investment management fees from Envestnet than from Ameriprise Financial Services for the same investment strategy available in the Select Separate Account Program. Ameriprise Financial Services eliminates this potential conflict of interest through a combination of disclosures and (i) by closing any duplicative investment strategies

in the Vista Separate Account Program to new clients and only offering such investment strategies in the Select Separate Account Program; and (ii) by migrating any Vista Separate Account that is also available in the Select Separate Account Program to the same investment strategy in the Select Separate Account Program.

The actual portion of the wrap fee paid to your financial advisor depends on the payout rate your financial advisor qualifies for and the amount of wrap fees you pay. In the Updated Pricing Framework, only the Advisory Fee is shared with your financial advisor.

- Independent contractor franchisees and independent contractors generally receive 72% to 91% and employee financial advisors generally receive 0% to 50% of the wrap fee (the "advisor payout rate"). In addition, the financial advisor may qualify for a bonus which could increase the effective advisor payout rate up to 96% for independent contractor franchisees or 57% for employee financial advisors.
- Bank employee financial advisors generally receive 0% to 91% of the Wrap Fee 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 a portion of the Wrap Fee but may receive compensation in the form of a bonus based in part on revenue generated through your Wrap Fee.
- In general, referral 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 financial advisory or 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, and whether the financial advisor was formerly associated with a firm acquired by Ameriprise Financial, Inc.

Ameriprise Financial offers a vast range of investment solutions to clients. Some products and services may be offered only by certain Ameriprise financial advisors. Discuss with your financial advisor the products he or she offers and the compensation your financial advisor receives as some investment product companies and issuers, including RiverSource, may pay higher compensation than others.

Our financial advisors primarily offer life, disability, and long-term care insurance and annuity products from RiverSource and certain pre-approved, but unaffiliated, insurance companies. However, in some situations where the client's needs may be met more effectively by another company's product, and RiverSource and other pre-approved providers do not offer such a product, Ameriprise financial advisors may offer insurance products issued by unaffiliated insurance companies.

If a nonproprietary insurance product is offered, the financial advisor is an appointed agent of the insurer and receives, directly or indirectly, compensation from the insurer for the sale and service of that product. The compensation for these nonproprietary products and RiverSource products is separate from, and in addition to, any fee you pay for investment advisory services and may vary depending on the type and size of the life insurance or annuity product that you purchase, the insurer that issues the product, the total number of life insurance and annuity 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, or the amount of the payments that you make on the life insurance or annuity product increases. Generally speaking, the compensation that the financial advisor will receive is calculated by a formula. This compensation may also increase as the financial advisor sells increasing amounts of life insurance or annuity products issued by that insurer.

In instances where a customer already owns a financial product sold by Ameriprise Financial, 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 cancellation 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.

Your financial advisor receives compensation for the marketing of and your opening of a credit card account with affiliated and non-affiliated financial institutions when you activate the card and make sufficient purchases.

Your financial advisor receives referral fees and client management fees when you purchase and maintain Ameriprise Auto and Home insurance products.

If the Bank accepts a trust based upon a referral from your financial advisor, Ameriprise Financial Services will receive a referral fee from the Bank. A portion of this referral fee is shared with your financial advisor. The referral fee is paid by the Bank from the fees earned for its services and is not an additional cost to the trust account. Your financial advisor also receives a referral fee for referrals to non-affiliated structured settlement professionals for both client and non-client referrals.

Incentives, training and education

Product companies with which we have agreements work with Ameriprise Financial and our financial advisors to promote their products. They may pay for training and education events; prospecting events such as seminars for employees, financial advisors, clients and prospective clients; or due diligence meetings. 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 or its sales leaders may, from time to time, offer contests or incentive programs to individual financial advisors or groups of financial advisors in particular areas. These contests and programs are limited to such targets as new client acquisition, financial plan count, net flows, total assets under management and financial advisor recruiting. Single product or product categories are not eligible for sales contests or 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. These programs and incentives and other cash and/or noncash compensation are subject to SEC and FINRA regulations as well as Ameriprise Financial internal compliance policies.

Ameriprise Financial from time to time recruits financial advisors from other firms to join Ameriprise Financial. In connection with these recruiting efforts, Ameriprise Financial 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. For financial advisors who entered into these arrangements prior to 2017, 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 manages this conflict of interest by supervising the suitability 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.

From time to time, Ameriprise Financial 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 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 incentivize your financial advisor to recommend you remain a client of the acquiring financial advisor and/or Ameriprise Financial.

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.

Loan programs

Clients may have access to information about lending products and services (e.g., mortgages, home equity loans, home equity lines of credit) through marketing relationships with third-party financial institutions. Financial advisors do not earn compensation related to lending products (e.g., mortgages, home equity loans, home equity lines of credit) offered and originated by third-party providers that have a marketing relationship with Ameriprise Financial. With the exception of margin lending, neither your Ameriprise financial advisor nor Ameriprise Financial may arrange, promote, suggest or knowingly permit you to use loan proceeds to purchase securities or other investment products.

Advisor-to-advisor training programs

Ameriprise Financial 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 that shares fees and commissions 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 financial advisor may be allowed to share a portion of the wrap fee he or she receives with one or more other Ameriprise financial advisor(s), including financial advisors who have not completed the Ameriprise Financial-required training to sell the investment advisory service, franchise consultants or registered principals, as described below.

In cases where two financial advisors are assisting you, both financial advisors may share in the wrap fee. Your servicing financial advisor will present the managed account or Ameriprise financial planning service, set the wrap fee, and oversee the analysis and advice prepared for you. Your servicing advisor may or may not be the financial advisor authorized to use discretion to purchase and sell securities in your account, e.g., your SPS Discretionary Advisor. In the instance that your

servicing advisor is not authorized to use discretion, the financial advisor authorized to use discretion will oversee the analysis and advice prepared for you. Only the financial advisor authorized to use discretion will purchase and sell securities in your managed account.

Your servicing advisor may or may not be the financial advisor who has completed the required training. A financial advisor who has not completed the required training may refer a client 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 investment advisory services for 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 your 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, may receive compensation based on services and products that you purchase, and for the training and leadership of your financial advisor. The cost of the product or service you purchase is not affected.

Your financial advisor may employ staff or work with other Ameriprise Financial staff to assist with creating your financial planning recommendations. This may include leveraging services in geographic locations outside of your financial advisor's location, including international locations.

Services provided may include entering data into financial planning software, proving initial calculation and assistance in creating solutions. Your financial advisor will provide final recommendations to you. For these services your financial advisor may pay a fee or salary to employed staff.

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

Employee financial advisors and selling leaders may receive continuing commissions for the sale of

certain products for up to five years after leaving the securities industry.

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.

Managed Accounts without a financial advisor

In the event that you request Ameriprise Financial Services to remove your current financial advisor from your Account or your financial advisor resigns from Ameriprise Financial Services or your Account, is terminated, or, for the SPS Advisor Program, your financial advisor is no longer able to act as your SPS Discretionary Advisor for any reason, the applicable Managed Account(s) will no longer have a financial advisor assigned to the Accounts. Generally, investment products in Managed Accounts can only be purchased through an Ameriprise financial advisor.

Sponsor may reassign your Managed Account to another financial advisor and notify you of the change. If your Managed Account is reassigned to another financial advisor prior to its termination, your Account(s) will continue to be billed but the Wrap Fee rate may change based on the rate you negotiate with your new assigned financial advisor.

We will attempt to notify you if your Account is no longer assigned to a financial advisor. If you would like to retain your Account, contact us within the time frame set out in the notification to have a financial advisor assigned. If the Account remains unassigned after the designated period of time, it will transfer to an Ameriprise brokerage account in accordance with the applicable Managed Account Client Agreement.

If your Account does not have a financial advisor assigned to it and certain client directed trades are permitted, you may contact our Service Center at 1.800.862.7919 for assistance with a transaction.

We will continue to collect and retain the full amount of any Wrap Fees paid to us in connection with your Managed Account, less any fees paid to an applicable Advisory Service Provider, until the Account is designated for potential transfer to an Ameriprise brokerage account or terminated. This includes the portion of the Wrap Fee that would have been paid to a financial advisor if one was assigned to your Managed Account(s). The fees retained are used in part to pay other employees and for the technology that supports the services Sponsor provides to you.

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.

Field leaders receive a salary and a bonus and are responsible for an operating budget for expenses. Bonus programs for Ameriprise Financial 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.

Code of ethics, participation or interest in transactions and personal trading

Code of ethics

As part of an overall internal compliance program, Ameriprise Financial has adopted policies and procedures imposing certain conditions and restrictions on transactions for the account of Ameriprise Financial and the accounts of our employees. Such policies and procedures are designed to prevent, among other things, any improper or abusive conduct when potential conflicts of interest may exist with respect to a customer or client. In addition, from time to time, restrictions are imposed to address the potential for self-dealing and conflict of interest which may arise in connection with the business of Ameriprise Financial as a broker-dealer. Ameriprise Financial has adopted various procedures to guard against insider trading.

Participation or interest in client transactions

From time to time Ameriprise Financial and/or its affiliates and related persons may invest in the same or related securities that Ameriprise Financial and/or its affiliates recommend to clients. Such transactions may occur at or about the same time that such securities are bought or sold for client accounts. Ameriprise Financial has adopted policies and procedures imposing certain conditions and restrictions on transactions in these securities, such as trading blackout periods and preclearance requirements.

See the **"Financial interest in products"** subsection in the **"Revenue Sources for Ameriprise Financial Services, Inc."** section in this guide for more information about our financial interest in the sale of certain products and services.

Personal trading rules and procedures

Ameriprise Financial has adopted personal trading rules and procedures within the Ameriprise Financial Code of Ethics and Personal Trading Policy. These rules are designed to list standards of business conduct and to mitigate potential conflicts of interest for all persons of Ameriprise Financial when they engage in personal securities transactions. You may request a copy of the Ameriprise Financial Code of Ethics and Personal Trading Policy from your financial advisor or by contacting us at 800.290.6663.

The standards of business conduct include compliance with applicable laws and regulations and with policies and procedures such as those contained in the Ameriprise Global Code of Conduct. Under the personal trading rules, persons are required to report their personal securities holdings and transactions, including transactions in certain mutual funds; must pre-clear certain investments; are restricted with respect to the timing of certain investments; and are prohibited from making certain investments. In addition, the Personal Trading Policy requires (i) Ameriprise employee financial advisors and their employees, (ii) its independent contractor franchisee financial advisors and their employees, and (iii) its affiliated investment advisers to conduct most personal trades through one of three designated broker-dealers unless an exception has been granted, and report any changes in their selected broker-dealer.

Insider trading policy

Ameriprise Financial and its related persons may, from time to time, come into possession of material nonpublic information that, if disclosed, might affect an investor's decision to buy, sell or hold a security.

Under applicable law, Ameriprise Financial and its related persons are prohibited from improperly disclosing or using such information for their personal benefit or for the benefit of any other person, regardless of whether such other person is a client. Accordingly, should Ameriprise Financial or its related persons come into possession of material nonpublic information with respect to any company, they may be prohibited from communicating such information to, or using such information for the benefit of, their respective clients, and have no obligation or responsibility to disclose such

information to, nor responsibility to use such information for the benefit of, their clients when following policies and procedures designed to comply with law. Ameriprise Financial and its affiliates have adopted an “Insider Trading Policy” in accordance with Section 204A of the Advisers Act that establishes procedures to prevent the misuse of material nonpublic information by Ameriprise Financial and its associated persons.

Review of Accounts

Certain supervisory functions are performed by Ameriprise Financial corporate office personnel. Corporate registered principals review a sampling of each financial advisor’s financial planning relationships, including written financial planning recommendations periodically based on certain key factors. At the time your managed account(s) are opened, our corporate registered principals will review your account(s) to confirm it is appropriate for your investment goals, time horizon, risk tolerance, and investment objectives. When appropriate, our corporate registered principals may also decide to call you directly to discuss your understanding of the Account(s), including the fees and expenses you will be paying. Our Compliance department also conducts routine surveillance of financial advisor activities. Clients receive written reports relating to their financial planning relationships from their financial advisor on at least an annual basis.

An important part of a managed account relationship involves providing you with the opportunity to engage in periodic reviews with your financial advisor or a designated member of the team servicing your Account. In these reviews, you and your financial advisor should discuss any changes to your financial situations, investment objectives and/or risk tolerance, and whether you would like to impose any reasonable restrictions on your Account(s).

Our supervision and monitoring does not substitute for your continued review and monitoring of your Account(s). You should review your account statements, trade confirmations, and other information we send to you. If you have any questions, please discuss them with your financial advisor.

Client referrals and other compensation

Referral arrangements and other economic benefits

Ameriprise Financial maintains formal and informal arrangements, the terms of which are disclosed to

the client, with individual professionals, professional firms, and select corporate, institutional or membership organizations (“Solicitors”), wherein compensation is paid to those Solicitors for referral of clients or members to Ameriprise Financial for its financial advisory services. The compensation to be paid in connection with these agreements is subject to negotiation between Ameriprise Financial and the applicable Solicitor. The compensation is (i) disclosed to the client at the time of the solicitation or referral; and (ii) will be paid out of the total wrap fees collected from you. You will not be charged an additional fee as a result of any referral arrangements. Compensation may include a one-time payment or ongoing payments based on a negotiated percentage of the quarterly investment wrap fees paid by you for the duration of the investment advisory relationship.

Ameriprise Financial may also make informal arrangements with individual clients wherein compensation is paid to those clients for referral of other individuals to Ameriprise Financial for financial advisory services.

Ameriprise Financial may form alliances and networking arrangements with financial institutions such as community banks, credit unions, credit union service organizations, Farm Credit Services and trust service providers (“Third Party Financial Institutions”) to allow its financial advisors to offer investment advisory services, financial planning services and certain other nondeposit investment and insurance products and services, described elsewhere in this Brochure, to retail customers/members of the Third Party Financial Institutions. As a result of these alliances or networking arrangements, financial advisors may not be able to offer to retail customers/members of the Third Party Financial Institutions certain products available through Ameriprise Financial or its affiliates. Also as a result of these alliances or networking arrangements, Third Party Financial Institutions may receive, in the form of a networking payment, a portion of wrap fees and securities and insurance commissions paid to financial advisors for sales to retail customers/members of the Third Party Financial Institutions.

Ameriprise Financial Institutions Group (“AFIG”) is a group of financial advisors at Ameriprise Financial Services that specialize in delivering investment programs to clients on the premises of financial institutions, such as banks and credit unions.

Ameriprise Financial Services enters into a networking arrangement with each financial institution whereby AFIG financial advisors provide investment advisory services, brokerage services and/or insurance products to clients

of the financial institution and other persons or entities otherwise introduced or referred to us by the financial institution. The financial institution provides Ameriprise Financial Services office space in the building where the financial institution conducts its business for AFIG financial advisors to provide investment advisory and other services on our behalf. In exchange for the use of its premises, Ameriprise Financial Services shares with the financial institution a portion of up to 91% of fees and commissions, including Wrap Fees charged for investment advisory services, generated by AFIG financial advisors and which are attributable to our operations on the premises. A portion of these fees are paid to bank employee financial advisors, as described below.

All AFIG financial advisors are licensed and registered through Ameriprise Financial Services, Inc. Ameriprise Financial Services has exclusive control over the activities conducted on our behalf on the premises of the financial institution and is responsible for the supervision of the activities of AFIG financial advisors. AFIG financial advisors are affiliated with Ameriprise Financial Services in one of three ways: independent contractors, Ameriprise employee financial advisors and bank employee financial advisors. Bank employee financial advisors are compensated by the financial institution from the portion of fees and commissions it receives from Ameriprise Financial Services. In this instance the financial institution serves as paying agent on our behalf for such compensation in accordance with applicable law. The level of compensation received by bank employee financial advisors is based on their employment agreement with the financial institution.

Ameriprise Financial Services does not pay any other compensation to any non-registered employee or agent of the financial institution for referrals. Any referral fees are paid by the financial institution to its employees or agents as a one-time, per-customer fee of a nominal, fixed dollar amount that is unrelated to the products and services you purchase.

AFIG financial advisors who do not have an existing Trust Department at the financial institution where they provide services can offer trust services through other providers, including our affiliate, Ameriprise Bank, FSB. In certain instances, Ameriprise Financial Services and the AFIG financial advisor may serve in the capacity of a finder in regard to trust accounts and business referred to unaffiliated trust providers and may receive a referral fee.

Ameriprise Financial Services is not a bank or credit union. Any services or products you purchase

through an AFIG financial advisor are not guaranteed or insured by Ameriprise Financial Services or the financial institution. The financial institution is not a party to your Client Agreement with us. Ameriprise Financial Services and each financial institution have entered into a networking agreement under which we have agreed to share fees and commissions with the financial institution, including Wrap Fees charged for investment advisory services.

Review of issuers of financial products

Ameriprise Financial and its affiliates have policies and procedures in place to review the issuers of financial products such as non-traded REITs, non-traded BDCs, non-traded closed-end funds, structured notes, and annuity and life insurance products that Ameriprise Financial permits its financial advisors to offer to some or all of its clients. This review includes publicly available information and reports issued by third parties and may in some cases include certain nonpublic information provided by the issuer. Ameriprise Financial periodically reassesses, but does not continuously monitor, the creditworthiness or financial solvency of third-party issuers. These policies and procedures are reasonably designed to mitigate our clients' exposure to credit and default risks resulting from an inability of the issuer to repay the principal on a note or fulfill an insurance obligation. However, you should be advised that credit markets can be volatile and the creditworthiness of an issuer may change rapidly. Ameriprise Financial, as a seller of these products, is prohibited by regulation from guaranteeing or providing any assurance that an issuer of financial products will be able to fulfill the issuer's obligation to any purchaser of such a product through Ameriprise Financial.

Revenue sources for RiverSource Life Insurance Company and, in New York only, RiverSource Life Insurance Co. of New York (collectively "RiverSource")

Sales charges. You pay sales and other charges under RiverSource fixed and variable annuity contracts and life insurance policies. For RiverSource fixed and variable annuity contracts, you may pay a contingent deferred sales charge, or surrender charge, if you withdraw funds during the applicable period.

Periodic fees and expenses. You pay certain fees and expenses under RiverSource annuity contracts and life insurance policies, including (depending on the type of contract or policy) mortality and expense, administrative, policy, contract, and cost of insurance fees or charges, in addition to costs associated with certain riders that may be available for both fixed and variable products.

Periodic expenses are also paid from product assets, such as 12b-1 fees paid from mutual fund assets (including 12b-1 fees paid on certain funds that serve as underlying investment options for variable annuities, variable life insurance). 12b-1 fees may be used to pay for marketing, distribution and shareholder service expenses.

Investment and interest income. Investment and interest income from insurance company general account assets derived, in part, from the amounts you pay for insurance and annuity benefits.

Variable annuity and variable life insurance financial arrangements. RiverSource selects the funds available within your variable annuity contract or variable life insurance policy. In doing so, RiverSource may consider various objective and subjective factors. These factors include compensation RiverSource may receive from fund assets (for those funds with 12b-1 plans); assets of the fund's adviser, subadviser or an affiliate of either; and assets of the fund's distributor or an affiliate. This compensation benefits RiverSource.

The amount of this revenue varies by fund, may be significant and may create potential conflicts of interest for RiverSource. The greatest amount and percentage of revenue that RiverSource receives comes from assets allocated to subaccounts investing in funds managed by its affiliates, CMIA, and Columbia Wanger Asset Management. In general, the revenue directly related to assets under management that RiverSource receives currently ranges up to 0.64% of the average daily net assets invested in the underlying funds through the variable annuity or variable life insurance contracts RiverSource issues. This revenue is in addition to revenues RiverSource receives from the charges you pay when buying, owning or surrendering your variable annuity contract or life insurance policy. In accordance with applicable laws, regulations and the terms of the agreements under which such revenue is paid, RiverSource may receive this compensation for various purposes including financial advisor training and compensation, marketing and distribution, customer servicing, transaction processing, record keeping, and other administrative services.

Revenue sources for Columbia Management and Threadneedle

Periodic fees and expenses. Columbia Management and Threadneedle International Limited may receive mutual fund management fees and certificate advisory and services fees for services, including investment management services for Active Portfolios®

investments. These revenues may be received by Columbia Management from the Columbia Funds, *Ameriprise* certificates and from other affiliated and nonaffiliated advisory clients of Columbia Management and Threadneedle International Limited.

Revenue sources for other Ameriprise Financial, Inc. companies

There are a number of other Ameriprise Financial, Inc. companies that will receive revenue, including the following:

- Ameriprise Certificate Company receives investment spread income earned on, and any early withdrawal penalty related to, *Ameriprise* certificates.
- Columbia Management Investment Services Corp. receives certain fees and expenses paid from the Columbia Funds and *Ameriprise* certificates in exchange for the transfer agent services it provides.
- American Enterprise Investment Services Inc. is compensated for its services through the brokerage commission and other fees charged for each brokerage transaction, which may include transactions made in the Bank's trust account(s), or through the brokerage commission which is included in the overall asset-based fee, depending on the account option you select. If the Sweep Option for your Account is the Ameriprise Insured Money Market Account (AIMMA), AEIS will receive compensation from the participating banks based on the cash balance in the AIMMA program. If your account sweeps uninvested cash to the Ameriprise Bank Insured Sweep Account (ABISA) or to the Bank as the participating bank in the AIMMA program, the Bank will not compensate AEIS, but will reimburse AEIS for its direct out-of-pocket expenses related to the sweep services provided.

Additionally, AEIS receives compensation in the form of interest charged on your margin account balance and order handling fees. In transaction-based brokerage accounts, AEIS may also engage in principal trading of certain types of fixed income securities for brokerage accounts — that is, it may buy and sell these securities for its own account with the objective of making a profit in certain circumstances, AEIS may buy these securities from you or sell these securities to you on a principal basis, in which case you will pay a markup or markdown on the transaction.

- AEIS performs, for the benefit of Ameriprise Financial, its financial advisors and clients, cost reimbursement and marketing support services as described in the

“Cost Reimbursement and Marketing Support”

section. In recognition of the above, product sponsors will compensate AEIS for such services that are performed by AEIS.

- The capacity in which AEIS acts in any particular transaction is disclosed on each transaction confirmation you receive. AEIS is also compensated for the shareholder services it provides for certain mutual fund companies. These services include but are not limited to delivering shareholder communications such as updated prospectuses and statements of additional information, transaction confirmations and annual tax reporting, and monitoring compliance with share class, discounted sales charge, market timing and other mutual fund company policies.
- Ameriprise Financial, Inc. receives fees paid from Columbia and the Columbia Funds and *Ameriprise* certificates in exchange for the administrative services it provides.
- Columbia Management Investment Distributors receives fees paid from the Columbia Funds in exchange for the distribution services it provides. Ameriprise Financial has a financial interest in the sale of the Columbia Funds, *Ameriprise* certificates and RiverSource products and certain other mutual funds.
- Ameriprise Financial Services sells annuity and insurance products manufactured by its RiverSource affiliates, as well as products from nonproprietary providers. RiverSource is permitted to reimburse Ameriprise Financial Services for client/prospect education events and advisor sales meetings, seminars, and training events pertaining to annuity and insurance products, consistent with Ameriprise Financial Services policies and industry regulation; Ameriprise Financial Services may also receive nominal noncash benefits from time to time. Nonproprietary annuity and life insurance providers may not provide some services, or the same level of services, to Ameriprise financial advisors. As a result, Ameriprise financial advisors may have a greater familiarity with RiverSource annuity and insurance products.
- Ameriprise Bank, FSB charges fees, depending on the terms of trust documentation and applicable state laws governing trust administration, through either the traditional investment model or advisor-based investment model. In the traditional

investment model, Ameriprise Bank, FSB provides investment management and assumes administrative responsibility, therefore earning a fee. Ameriprise Bank, FSB earns a fee and pays a portion of the fee it collects to Ameriprise Financial, Inc. In the advisor-based investment model, Ameriprise Bank, FSB fees for administrative services are separate from investment management fees charged by financial advisors and are not shared with Ameriprise Financial, Inc. Additionally, when the Bank is a participating bank in the AIMMA program or ABISA is the Sweep Option, the Bank earns income by lending or investing the deposits it receives and charging a higher interest rate to borrowers, or earning a higher yield, than it pays on the deposits held through these sweep programs. The difference is known as the “spread.”

Custody

In establishing an Account, you establish and maintain a brokerage account with Sponsor. Neither Sponsor, nor any Advisory Service Provider will act as custodian for the Account or take possession of any assets in the Account. AEIS, one of our broker-dealer affiliates, provides custody and safekeeping services for Account assets and will ordinarily act as the custodian for all assets held in an Account. Because our affiliate maintains custody of our clients’ assets, we are required by SEC rules and regulations to obtain from AEIS at least annually a written internal control report (the “ICR”) prepared by a qualified independent public accountant, and AEIS is required to undergo an independent verification of the assets under its control. The ICR that we receive from AEIS is intended to show that our affiliate has established appropriate custodial controls with respect to client assets under custody. For Retirement Accounts where ATC acts as custodian or trustee, AEIS shall act as an agent or sub custodian of ATC with respect to custody of assets.

Investment Discretion

Your Ameriprise financial advisor does not manage your securities or other investments on your behalf as part of Ameriprise financial planning service. However, your financial advisor may offer a discretionary investment advisory service separately as part of our SPS Advisor service.

Voting Client Securities

For SPS *Advantage*, SPS Advisor and Active Portfolios®, Ameriprise Financial and your financial advisor are not required to take any action or give any advice regarding the voting of proxies solicited by or with respect to the

issuers of securities in which assets of your managed account(s) may be invested. Ameriprise Financial will promptly send you proxy ballots and related shareholder communications that we receive. If you have questions about your proxy materials, please contact your financial advisor or contact us at 800.290.6663.

For Select Separate Account, including Select Strategist UMA, Vista Separate Account, Investor Unified Account and Access Account, you have the right to vote proxies on the securities in which your account assets may be invested from time to time, or you may delegate the authority to vote these proxies to the applicable investment manager where Sponsor has trading discretion over the assets in your Account. You may delegate the authority to vote proxies on your behalf to another person. Except for certain Select Separate Accounts where you delegate proxy voting authority to Sponsor and the investment manager allows Sponsor to vote proxies for the Account(s), Sponsor and your financial advisor do not take any action or give advice regarding the voting of proxies solicited by or with respect to the issuers of securities in which assets of your managed account(s) may be invested. Sponsor will forward to you all proxy solicitations and materials related to other corporate actions that are received by Sponsor with respect to assets in your managed account(s). You are responsible for voting proxies and effectuating other corporate actions relating to the securities held in your respective managed account(s).

Neither Sponsor, your financial advisor nor any Advisory Service Provider are responsible for any other corporate actions relating to the assets in your managed account(s) including administrative filings such as proofs of claims related to bankruptcy or claims in class actions.

Sponsor's Proxy Voting Policies and Procedures

When Sponsor has proxy voting authority, Sponsor will apply the following general principles to meet its proxy voting responsibilities:

- Seek to ensure that proxies are voted in the best economic interest of clients;
- Address material conflicts of interest that may arise; and
- Comply with disclosure and other requirements as required by law.

Sponsor intends to vote all proxies of which it becomes aware prior to the vote deadline. However, in certain limited circumstances, Sponsor may determine to refrain from voting.

Sponsor will use an independent third party proxy service for its fundamental research on proxy questions and subsequent recommendations, and has adopted the third party provider's proxy voting guidelines covering certain types of proposals. The guidelines indicate whether to vote for, against or abstain from a particular proposal. In circumstances where proposals are not covered by the guidelines or a voting determination must be made on a case-by-case basis, the Managed Accounts Program Oversight Committee will make the voting determination. The Managed Accounts Program Oversight Committee may consider the voting recommendations of analysts, investment managers and information obtained from outside resources. The Managed Accounts Program Oversight Committee reserves the right to consider each proxy vote, whether covered by the guidelines or a third-party recommendation, based on the facts and circumstances of the proposal presented, and submit a vote that it believes is in the best economic interest of its clients.

Sponsor has implemented policies reasonably designed to identify potential material conflicts of interest to help us vote proxies without undue influence from individuals or groups who may have an economic interest in the outcome of a proxy vote. These policies include:

- Employing predetermined voting guidelines;
- Causing proxies to be voted in accordance with recommendations of an independent third party;
- Causing the proxies to be delegated to an Independent third party, which may include Sponsor's proxy voting service provider; or
- In unusual cases, with the client's consent and upon ample notice, forwarding the proxies to Sponsor's clients so that they may vote the proxies directly.

Each investment manager to which you delegate voting authority will vote proxies according to its own applicable voting policies and procedures. Where you own both a Select Separate Account and another discretionary managed account and both Accounts invest in the same SMA strategy managed by the same investment manager, this may result in different voting determinations by Sponsor and the investment manager for the same particular proposal.

We maintain proxy voting records to meet our obligations under applicable law. You may obtain a copy of our proxy voting policy, and other information regarding how your proxies were voted, upon request by writing to us at Ameriprise Financial, Inc., 70400 Ameriprise Financial Center Minneapolis, MN 55474 or calling 800.297.6663.

The Ameriprise Financial Business Continuity Management Program

At Ameriprise Financial, we develop long-term relationships with our clients and strive to serve them with a personalized approach in meeting their financial needs while providing outstanding client service. Maintaining an effective business continuity program is essential to achieving that goal. We are committed to service and protect our clients' and the company's assets without disruption while meeting our regulatory obligations.

We dedicate significant resources to maintain and evolve our business continuity capabilities. The Program's framework addresses every level of the organization through the remediation of facilities, technology, applications, data, processes, governance and corporate strategy — making continuity a part of the way we do business.

Crisis management

As part of our business continuity management program, we maintain a robust crisis-management structure that allows us to respond efficiently and effectively during a business disruption or crisis event. Training and education are provided to help prepare staff for possible business disruptions, as well as validate a response for a variety of possible incidents with key employees.

The Crisis Response Team (CRT), composed of senior leaders, coordinates our response to help protect the well-being of employees, safeguard assets and provide continuity of critical processes.

The CRT utilizes a web-based mass notification system to communicate with staff, as well as a crisis hotline for employees to report crisis events and obtain event status information.

Business continuity

Each line of business maintains business continuity plans (BCPs) designed to address the unit's specific needs and potential risks.

BCPs are updated annually or in the event of a material change. We conduct a business-impact analysis with each business area, which helps determine critical processes and drives recovery strategies to minimize potential risks.

Plans are based upon a proactive "all hazards" approach to address disruptions of varying severity and scope, and include both short- and long-term disruptions.

Our multiple recovery-solution strategies enable us to activate our recovery solutions based upon the event's severity and duration. Key components include alternate workplace recovery facilities, remote access workplace strategies and geo-dispersed operations. Our flexible, multifaceted approach allows us to respond appropriately and effectively based on the type of event.

Our recovery approach is designed to guard against the loss of critical data.

Disaster recovery

Disaster recovery plans (DRPs) identify the key components and procedures to recover an application within the business requirements. DRPs are developed, maintained and tested by our technology teams to address the specific needs and risks of each information-technology system or application at Ameriprise and our affiliates and subsidiaries. Plans are updated to reflect the most current information, and are renewed annually, which includes a detailed review and approvals process. Applications deemed business critical regularly participate in disaster-recovery exercises to test and validate the recoverability of data.

Conclusion

This is an overview of the business continuity management program. Should there be a significant business disruption, visit ameriprise.com for additional information.

If you have questions, please contact us at:

Ameriprise Financial

Attn: Ameriprise Business Continuity Management Team
117 Ameriprise Financial Center
Minneapolis, MN 55474

Appendix A

Summaries of 2018 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, 2018–Dec. 31, 2018)

Fund firm	Cost reimbursement payments from fund firms in 2018 ¹	Source of payment
Allianz	\$1,129,225	Allianz Global Investors Distributors, LLC
American Century	\$7,187,254	American Century Investment Services, Inc.
BlackRock	\$15,092,637	BlackRock Advisors, LLC
Calvert ²	\$1,716,087	Eaton Vance Distributors, Inc.
Columbia	\$65,792,521	Columbia Management Investment Distributors, Inc.
Delaware	\$4,439,466	Delaware Investments
Dreyfus Funds	\$2,689,384	MSBC Securities Corporation
DWS	\$2,837,070	DWS Distributors Inc.
Eaton Vance	\$7,573,628	Eaton Vance Distributors, Inc.
Federated	\$3,667,530	Federated Securities Corp.
Fidelity	\$19,593,404	Fidelity Distributors Corporation
Goldman Sachs	\$5,726,389	Goldman, Sachs & Co. LLC
Invesco	\$9,134,668	Invesco Distributors, Inc.
IVY Funds	\$2,924,462	Ivy Funds Distributor, Inc.
Janus Henderson	\$5,548,102	Janus Henderson Distributors
John Hancock	\$10,578,816	John Hancock Funds, LLC
JP Morgan	\$8,782,906	J.P Morgan Distribution Services, Inc.
Legg Mason	\$5,560,588	Legg Mason & Co., LLC
Lord Abbett	\$7,000,053	Lord Abbett Distributor LLC
Mainstay	\$2,750,867	NYLIFE Distributors, LLC
MFS	\$18,397,928	MFS Fund Distributors, Inc.
Neuberger Berman	\$1,052,596	Neuberger Berman LLC
Nuveen	\$7,892,732	Nuveen Investments
Oppenheimer	\$12,680,640	Oppenheimer Funds Distributor, Inc.
Principal	\$2,731,602	Principal Financial Services, Inc.
PGIM	\$8,203,620	Prudential Investments, LLC
Putnam	\$3,325,393	Putnam Retail Management Limited Partnership
Virtus	\$3,584,863	Virtus Investment Partners, Inc.
Wells Fargo	\$11,668,691	Wells Fargo Funds Distributor, LLC
Total cost reimbursement payments from fund firms in 2018	\$259,263,124	January 1, 2018, through December 31, 2018

¹ "Cost Reimbursement payments" represents amounts recognized as revenue by American Enterprise Investment Services Inc. for the billing period from January 1, 2018, through December 31, 2018, on retail mutual fund assets. These figures also include amounts pertaining to participation in Ameriprise-organized conferences.

² Calvert Investment Distributors, Inc. was acquired by Eaton Vance Distributors, Inc. January 3, 2017.

529 plan cost reimbursement arrangements by fund firm (Jan. 1, 2018–Dec. 31, 2018)

Program Manager or Distributor	State(s)	Cost reimbursement payments from fund firms in 2018 ³	Source of payment
American Century	KS	\$180,866	American Century Investment Services, Inc.
BlackRock ⁴	OH	\$50,000	BlackRock Advisors, LLC
Columbia	SC	\$584,319	Columbia Management Investment Distributors, Inc.
Fidelity	NH	\$1,884,631	Fidelity Distributors Corporation
Franklin Templeton	NJ	\$48,759	Franklin Templeton Distributors, Inc.
Hartford	CT, WV	\$52,435	Hartford Securities Distribution Co., Inc.
IVY Funds	AZ	\$10,684	Ivy Funds Distributors, Inc.
John Hancock	AK	\$485,971	John Hancock Funds, LLC
JP Morgan	NY	\$390,483	J.P. Morgan Distribution Services, Inc.
Legg Mason	CO	\$183,108	Legg Mason & Co., LLC
MFS	OR	\$162,857	MFS Fund Distributors, Inc.
Nuveen	MI	\$35,455	Nuveen Investments
Oppenheimer	IL, NM	\$167,921	Oppenheimer Funds Distributor, Inc.
Putnam	NV	\$47,149	Putnam Retail Management Limited Partnership
Voya	WI	\$330,025	VOYA Investment Distributor, LLC
Total cost reimbursement payments from fund firms in 2018		\$4,614,662	January 1, 2018, through December 31, 2018

³ “Cost Reimbursement Payments” represents amounts recognized as revenue by American Enterprise Investment Services Inc. for the billing period from January 1, 2018, through December 31, 2018, on 529 plan assets. These figures also include amounts pertaining to participation in Ameriprise-organized conferences.

⁴ A flat-fee amount paid in lieu of asset-based cost reimbursement.

Resolving issues or concerns

We're committed to helping you meet your financial goals, and we work hard to maintain strong relationships with all our clients. That means we'll work as quickly as possible to resolve any issues or concerns you may have, if and when they come up.

Always check your account statements and confirmations to see if your transactions were processed according to your instructions — the right investments in the right amounts. Also look for fees that you don't understand. If you see incorrect information on your account statements or confirmations, or if you have any other issues, you may take the following steps:

1. Contact your financial advisor right away. If you don't have a financial advisor, contact the Customer Service Department at 1.800.862.7919. Most issues are addressed by speaking with a financial advisor or a Customer Service Department associate.
2. Contact your financial advisor's branch office and ask to speak to the registered principal.

3. If the issue is not addressed to your satisfaction, please contact the Ameriprise Financial Compliance Department at 1.866.738.5934 or at the address noted below with your concerns:

Ameriprise Financial
2923 Ameriprise Financial Center H26/2923
Minneapolis, MN 55474

Any oral communications should be reconfirmed in writing to further protect your rights, including rights under the Securities Investor Protection Act (SIPA).

4. If you're unsatisfied with our response to your concerns, you may contact your state securities and/or insurance regulator or FINRA at FINRA.org.

At Ameriprise Financial, we want our clients to be clear on how we do business. We hope this guide helps clarify our relationship with you. It is meant to be a resource, but we understand that the core of our success is in our personal relationships. Please contact your financial advisor or us with any questions you may have. We're delighted to have you as part of our Ameriprise Financial family.

Notes

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**A tradition of commitment since 1894.
A legacy of putting clients first.**

For more than 125 years, Ameriprise has been committed to putting our clients' needs first. Our advisors develop ongoing one-to-one relationships and take time to understand what's truly important to clients and their families. We offer a comprehensive approach to financial planning that helps our clients feel confident, connected and in control of their financial life.



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Investment products provided through Ameriprise Financial are not FDIC insured, are not deposits or obligations of, or guaranteed by, any banking institution and involve investment risks including possible loss of principal and fluctuation in value. Balances maintained in our bank sweep programs (AIMMA and ABISA) are insured by the Federal Deposit Insurance Corporation (FDIC) up to applicable limits. The FDIC website at fdic.gov allows you to determine the amount of your deposits which are insured. For more information, please contact the FDIC directly at 877.ASK.FDIC (877.275.3342).

Investors should consider the investment objectives, risks, charges and expenses of a mutual fund, certificate, variable annuity or variable life insurance product or 529 plan carefully before investing. For a free prospectus, disclosure documents or other important information about financial products, call 800.862.7919. Read the prospectus and/or disclosure information before you purchase or invest.

The following companies are all part of Ameriprise Financial, Inc.

Ameriprise Certificates are issued by Ameriprise Certificate Company and distributed by Ameriprise Financial Services, Inc.

RiverSource branded insurance and annuity products are distributed by RiverSource Distributors, Inc., Member FINRA, and are issued by RiverSource Life Insurance Company and, in New York only, by RiverSource Life Insurance Co. of New York, Albany, NY.

Columbia Funds and Columbia Acorn Funds are distributed by Columbia Management Investment Distributors, Inc., Member FINRA. Columbia Funds are managed by Columbia Management Investment Advisers, LLC, and Columbia Acorn Funds are managed by Columbia Wanger Asset Management, LLC, a subsidiary of Columbia Management Investment Advisers, LLC.

Ameriprise Bank, FSB provides deposit, lending, and personal trust products and services to its customers, including clients of Ameriprise Financial Services, Inc. ("AFSI"). Ameriprise Bank, FSB and AFSI are subsidiaries of Ameriprise Financial, Inc. Ameriprise financial advisors may receive compensation for selling bank products.

Neither Ameriprise Bank, FSB nor AFSI financial advisors are authorized to give legal or tax advice. For specific legal or tax matters, clients should consult with their own legal and/or tax advisors.

Investment products made available through AFSI are not FDIC insured, are not deposits or other obligations of Ameriprise Bank, FSB and are not guaranteed by Ameriprise Bank, FSB, and are subject to investment risks, including possible loss of principal invested.

Investment advisory products and services are made available through Ameriprise Financial Services, Inc., a registered investment adviser.

Ameriprise Financial Services, Inc. Member FINRA and SIPC.

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