

# Edward Jones Retirement Plan Services Brochure

as of August 20, 2020

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## Item 1: Cover Page

This brochure provides information about the qualifications and business practices of Edward D. Jones & Co., L.P. ("Edward Jones," "we" or "us"). If you have any questions about the contents of this brochure, please contact us at 800-803-3333. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about Edward Jones is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Item 2: Material Changes

No material changes have been made to the brochure since our last annual update filed on March 22, 2020.

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## Item 4: Advisory Business

Edward Jones is a registered broker-dealer and investment adviser. As an investment adviser, Edward Jones offers several advisory programs, subject to program eligibility requirements. One such program is Edward Jones Retirement Plan Services ("Retirement Plan Services"). This brochure ("Brochure") provides plan sponsors (the "Plan Sponsor") of employee benefit plans (the "Plan") subject to the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), with information about Edward Jones, Retirement Plan Services, the fees charged for Retirement Plan Services ("Retirement Plan Services Fee") and our business practices. The Plan Sponsor (or, to the extent the Plan Sponsor has delegated its investment authority to an investment committee, the committee) is also referred to as "Client," "you" or "your." Please review this Brochure carefully before you decide to participate in Retirement Plan Services.

We offer our Retirement Plan Services to plans that allow participants to exercise independent control over the investment of their individual accounts ("Participant-Directed Plans") and to other plans, such as defined benefit and defined contribution plans that do not allow participants to exercise control over plan investments ("Pooled Plans").

Other advisory programs offered through Edward Jones are not described in this Brochure. These programs offer different services and have different fees and eligibility requirements. To learn more about other advisory programs offered by Edward Jones, please ask your financial advisor or go to [www.edwardjones.com/advisorybrochures](http://www.edwardjones.com/advisorybrochures) to review the brochures for the available advisory programs.

Edward Jones is the primary operating subsidiary of The Jones Financial Companies, L.L.P. ("JFC"), a holding company registered as a partnership with the State of Missouri. Edward Jones registered with the SEC as a broker-dealer in 1941 and as an investment adviser in 1993. Edward Jones became a member of the National Association of Securities Dealers ("NASD") (now known as the Financial Industry Regulatory Authority ("FINRA")) in 1939.

As of December 31, 2019, we managed \$213,656,983,626 in discretionary assets and \$209,579,596,280 in non-discretionary assets across all of our advisory programs.

The decision to participate in this program is yours. Before making this decision, you and your financial advisor should discuss whether this program is appropriate for your investment goals or needs. If you decide to participate in Retirement Plan Services, you will enter into a written Edward Jones Retirement Plan Services Agreement (the "Agreement") between you, as the responsible plan fiduciary for the Plan, and us. In addition, you will appoint an Edward Jones-approved platform provider for the Plan (the "Platform Provider") and Independent Investment Fiduciary (defined below).

In a Participant-Directed Plan, the "Independent Investment Fiduciary" may be either an ERISA Section 3(21) investment adviser ("Section 3(21) investment adviser"), an investment adviser or manager who provides services comparable to those provided by a Section 3(21) investment adviser (also referred to as a "Section 3(21) investment adviser"), or an ERISA Section 3(38) investment manager ("Section 3(38) investment manager"), as described in more detail below.

In a Pooled Plan, the "Independent Investment Fiduciary" will be a Section 3(21) investment adviser. The Agreement includes our acknowledgment that Edward Jones is serving as a Section 3(21) non-discretionary investment adviser under ERISA when providing fiduciary services.

Clients participating in Retirement Plan Services typically:

- value recommendations from Edward Jones when selecting a Platform Provider;
- value recommendations from Edward Jones when selecting Eligible Investment Options (defined below) offered by a Participant-Directed Plan or investments for a Pooled Plan and annual reviews of the same;

- value educational services for the Plan;
- value educational services for Plan participants; and/or
- are comfortable paying asset-based (percentage) fees for advisory services.

Typically, Clients work directly with one Edward Jones financial advisor. However, certain Clients, such as large Plans with participants in multiple locations or Plans that are transitioning from one financial advisor to another, may work with more than one financial advisor in order to serve the needs of the Plan. In some situations, these Clients will receive fiduciary services from one financial advisor and non-fiduciary services (e.g., educational services) from one or more other Edward Jones financial advisors. Alternatively, these Clients could receive fiduciary and non-fiduciary services from more than one financial advisor. Regardless of the number of Edward Jones financial advisors providing services or the determined service arrangements, there is no impact or change to the fees paid by the Client for the services provided.

### Retirement Plan Services for Participant-Directed Plans

Through Retirement Plan Services, Edward Jones offers the following services to Participant-Directed Plans: (1) recommending Platform Providers from a set list maintained by Edward Jones that may, for example, serve as custodian, record-keeper or otherwise provide services to you; (2) providing non-discretionary investment advice regarding Eligible Investment Options offered by the Participant-Directed Plan; and (3) providing educational services to Client and Plan participants.

**Fiduciary Services for Participant-Directed Plans.** When we recommend Platform Providers and provide non-discretionary investment advice regarding Eligible Investment Options offered by a Participant-Directed Plan, we are acting as a fiduciary under Section 3(21) of ERISA ("Participant-Directed Fiduciary Services").

**Platform Provider and Independent Investment Fiduciary Recommendations to Participant-Directed Plans.** Edward Jones will assist you with your search for Platform Providers to provide custodial, investment and/or record-keeping services to the Plan. We also will provide you with a list of third-party administrators ("TPAs") reviewed by Edward Jones. However, Edward Jones' assistance in your search for TPAs is for informational purposes only as described below under "Educational Services to Participant-Directed Plans."

We will limit our recommendations to a select number of Edward Jones-approved Platform Providers that offer investment-related fiduciary services through an "Independent Investment Fiduciary" or the "Independent Investment Fiduciaries." Your preference for an Independent Investment Fiduciary offering its services as either a Section 3(21) investment adviser or Section 3(38) investment manager will be a factor in our recommendation of Platform Providers since not all Platform Providers offer Independent Investment Fiduciaries who serve as both a Section 3(21) investment adviser and a Section 3(38) investment manager. In addition, your preference for a mutual fund platform or a group annuity platform also will be a factor in our recommendation of Platform Providers since not all Platform Providers offer both a mutual fund platform and a group annuity platform. From the investment options available to the Plan through the Platform Provider, your Independent Investment Fiduciary will develop a list of investment options that it has found to be prudent for your Plan ("Eligible Investment Options"). Section 3(21) investment advisers will then present these Eligible Investment Options for your consideration as the Plan Sponsor for inclusion in the Plan. Section 3(38) investment managers will select and maintain the investment options for the Plan. The Eligible Investment Options selected by you, as Plan Sponsor, or selected by your Section 3(38) investment manager become the investment options made available to the Plan ("Plan Investments").

Although Edward Jones will recommend Platform Providers and

Independent Investment Fiduciaries, you will be responsible for selecting the Platform Provider and the Independent Investment Fiduciary and entering into separate contractual relationships with the Platform Provider and the Independent Investment Fiduciary. In order to participate in Retirement Plan Services, you must select an Edward Jones-approved Platform Provider and Independent Investment Fiduciary.

**Removal of an Eligible Investment Option by your Independent Investment Fiduciary.** For plans utilizing a Section 3(21) investment adviser, a Plan Investment may require replacement because your Section 3(21) investment adviser has determined that the investment is no longer an Eligible Investment Option, at which point both the Independent Investment Fiduciary and Edward Jones will disclaim all fiduciary responsibility for the investment, and it thus becomes an "Uncovered Investment." When this occurs, your Section 3(21) investment adviser will provide a recommendation to replace the Uncovered Investment with an alternate Eligible Investment Option after providing notice to you in accordance with the Section 3(21) investment adviser's procedures, the details of which will be found in your agreement with your Section 3(21) investment adviser. Section 3(21) investment advisers also provide "automatic execution" or "automatic replacement services." This means that if you agree to or otherwise accept the Independent Investment Fiduciary's replacement recommendation, your Platform Provider will automatically implement the Independent Investment Fiduciary's recommendation by removing the Uncovered Investment from your Plan Investments and replacing it with the recommended Eligible Investment Option.

If you choose to decline your Section 3(21) investment adviser's replacement recommendation, you must work with your Edward Jones financial advisor to choose an alternate Eligible Investment Option. If the Uncovered Investment is not replaced within a period of time as determined and communicated by Edward Jones, Edward Jones may, in its sole discretion, provide notice of termination of the Retirement Plan Services Agreement and Edward Jones' resignation as a Section 3(21) investment adviser to the Plan. Please refer to your agreement with your Section 3(21) investment adviser for details regarding its provision of automatic execution or automatic replacement services.

For plans utilizing a Section 3(38) investment manager, your Section 3(38) investment manager will be responsible for removing and replacing Plan Investments available in the Plan.

**Non-Discretionary Investment Advice to Participant-Directed Plans.** The Independent Investment Fiduciary will be responsible for the following: (1) the recommendation or selection of the Eligible Investment Options to be offered by or available to the Plan; (2) the ongoing monitoring and continued availability of such Eligible Investment Options; (3) the removal and replacement of Eligible Investment Options that do not meet the Independent Investment Fiduciary's criteria; and (4) the addition, from time to time, of new Eligible Investment Options that meet the Independent Investment Fiduciary's criteria.

Edward Jones will rely on the decisions made by Client (based on the recommendations of the Section 3(21) investment adviser) or decisions made by the Section 3(38) investment manager. Edward Jones will only provide advice regarding Eligible Investment Options. Subject to the foregoing, Edward Jones will provide non-discretionary investment advice to Client regarding the Eligible Investment Options to be offered by the Plan, including advice regarding the selection of Plan Investments, in order to provide a broad range of investment alternatives consistent with ERISA Section 404(c) and the regulations thereunder, unless all of the Plan Investments were selected by a Section 3(38) investment manager.

## Retirement Plan Services for Pooled Plans

Through Retirement Plan Services, Edward Jones offers the following services to Pooled Plans: (1) recommending Platform Providers from a set list maintained by Edward Jones that may, for

example, serve as custodian, record-keeper or otherwise provide services to you; (2) providing non-discretionary investment advice regarding Eligible Investment Options to be selected by the Pooled Plan; and (3) providing educational services to Client.

**Fiduciary Services for Pooled Plans.** When we recommend Platform Providers and provide non-discretionary investment advice, we are acting as a fiduciary under Section 3(21) of ERISA ("Pooled Plan Fiduciary Services").

**Platform Provider and Independent Investment Fiduciary Recommendations to Pooled Plans.** Edward Jones will assist you with your search for Platform Providers to provide custodial, investment and/or record-keeping services to the Pooled Plan. We also will provide you with a list of TPAs reviewed by Edward Jones. However, Edward Jones' assistance in your search for TPAs is for informational purposes only as described below under "Educational Services to Pooled Plans."

With respect to Pooled Plans, we will limit our recommendations to a select number of Edward Jones-approved Platform Providers that offer investment-related fiduciary services through an Independent Investment Fiduciary. You will not be given the option of receiving investment-related fiduciary services through Section 3(38) investment managers that exercise discretion to select all investment options for the Plan.

Your preference for a mutual fund platform or a group annuity platform will be a factor in our recommendation of Platform Providers since not all Platform Providers offer both a mutual fund platform and a group annuity platform.

Although Edward Jones will recommend Platform Providers and Independent Investment Fiduciaries, you will be responsible for selecting the Platform Provider and the Independent Investment Fiduciary and entering into separate contractual relationships with the Platform Provider and the Independent Investment Fiduciary. In order to participate in Retirement Plan Services, you must select an Edward Jones-approved Platform Provider and Independent Investment Fiduciary.

**Removal of an Eligible Investment Option by your Independent Investment Fiduciary.** A Plan Investment may require replacement because your Independent Investment Fiduciary has determined that the investment is no longer an Eligible Investment Option, at which point both the Independent Investment Fiduciary and Edward Jones will disclaim all fiduciary responsibility for the investment, and it becomes an "Uncovered Investment." When this occurs, your Independent Investment Fiduciary will provide a recommendation to replace the Uncovered Investment with an alternate Eligible Investment Option after providing notice to you in accordance with the Independent Investment Fiduciary's procedures, the details of which will be found in your agreement with your Independent Investment Fiduciary. Your Independent Investment Fiduciary will also provide "automatic execution" or "automatic replacement services." This means that if you agree to or otherwise accept the Independent Investment Fiduciary's replacement recommendation, your Platform Provider will automatically implement the Independent Investment Fiduciary's recommendation by removing the Uncovered Investment from your Plan Investments and replacing it with the recommended Eligible Investment Option.

If you choose to decline your Independent Investment Fiduciary's replacement recommendation, you must work with your Edward Jones financial advisor to choose an alternate Eligible Investment Option. If the Uncovered Investment is not replaced within a period of time as determined and communicated by Edward Jones, Edward Jones may, in its sole discretion, provide notice of termination of the Retirement Plan Services Agreement and Edward Jones' resignation as a Section 3(21) investment adviser to the Plan.

Please refer to your agreement with your Independent Investment Fiduciary for details regarding its provision of automatic execution or automatic replacement services.

**Non-Discretionary Investment Advice to Pooled Plans.** The Independent Investment Fiduciary will be responsible for the following: (1) the recommendation of the Eligible Investment Options available to the Plan; (2) the ongoing monitoring and continued availability of such Eligible Investment Options; (3) the removal and replacement of Eligible Investment Options that do not meet the Independent Investment Fiduciary's criteria; and (4) the addition, from time to time, of new Eligible Investment Options that meet the Independent Investment Fiduciary's criteria.

Edward Jones will rely on the decisions made by Client (based on the recommendations of the Section 3(21) investment adviser). Edward Jones will only provide advice with respect to the Eligible Investment Options recommended by the Independent Investment Fiduciary.

Subject to the foregoing, Edward Jones will provide non-discretionary investment advice to Client regarding the Eligible Investment Options to be selected by the Plan, including advice regarding asset allocation and the selection of investments consistent with a defined benefit Pooled Plan's investment objectives or asset class guidance for a defined contribution Pooled Plan.

### Platform Provider Platforms

There are two types of platforms that may be available through a Platform Provider: a mutual fund platform and a group annuity platform. A mutual fund platform will offer investments in mutual funds, exchange-traded funds, collective investment funds, stable value funds and/or money market funds. A group annuity platform will offer investments in mutual funds, stable value funds, money market funds, collective investment funds and/or annuities. Although Edward Jones will recommend Plan Investments from among the Eligible Investment Options, Client (with assistance from its Section 3(21) investment adviser) or Client's Section 3(38) investment manager will be responsible for the final selection of Plan Investments.

**Excluded Assets.** Edward Jones has no responsibility to provide any services related to the following types of Plan assets: any portion of Plan assets that are not maintained on the platform of the Platform Provider or are maintained on the platform at the direction or recommendation of a third party (the "Outside Assets"); employer securities; real estate (except for publicly traded real estate investment trusts); life insurance; brokerage accounts or mutual fund windows; participant loans; non-publicly traded partnership interests; other non-publicly traded securities or property; and other hard-to-value or illiquid securities or property (collectively with the Outside Assets, "Excluded Assets"). Edward Jones has no responsibility to provide any services related to Excluded Assets (or that otherwise take into account Excluded Assets). The Excluded Assets will be disregarded in determining the Retirement Plan Services Fee, and the Retirement Plan Services Fee will be calculated only on the remaining assets (the "Included Assets" or the "Assets" or "assets"), which may result in the Plan being subject to a higher annual fee rate (as discussed in Item 5).

### Educational Services to Participant-Directed Plans

When we provide educational services to Client and/or Plan participants in Participant-Directed Plans, we are not acting as a fiduciary of the Plan under ERISA.

**Education of Client.** Edward Jones will provide education on plan types and work with the Platform Provider to assist with Plan setup. In order to assist Client in the consideration of a TPA, Edward Jones will provide information on the role of TPAs to Participant-Directed Plans as well as information about the core services a TPA should provide and other factors, including a list of TPAs that have been reviewed by Edward Jones. Edward Jones will not provide recommendations for specific TPAs for Plans. Client is responsible for selecting the TPA for the Plan and is not required to select a TPA from the list provided by Edward Jones.

**Education of Plan Participants.** Edward Jones will assist Client with developing an education plan for Plan participants, which may include group education sessions or one-on-one educational

meetings agreed to by the Plan sponsor and an Edward Jones financial advisor. Edward Jones will conduct Plan participant education meetings upon request, including enrollment meetings and explaining general financial and investment information. This information will include risk tolerance and asset allocation, general retirement planning topics (such as income replacement ratio, inflation risk and longevity risk), and how each Plan Investment maps to an asset class. Edward Jones will also conduct Plan participant seminars on broad retirement planning topics, as well as other agreed-upon topics, upon request.

Edward Jones will educate Plan participants upon request about asset allocation, in which a portion or percentage of investments will be invested in various asset classes based on the Plan participant's portfolio objective and risk tolerance ("Asset Allocation"). Asset Allocation cannot eliminate risk associated with investing, but it can help to keep a Plan participant's account within a stated risk tolerance range. Edward Jones may, at its discretion, provide asset allocation models and interactive investment materials, such as questionnaires, worksheets, software or similar materials that enable Plan participants to estimate future retirement needs. Finally, Edward Jones may provide information about future distributions from the Plan.

For Participant-Directed Plans, Edward Jones does not provide actuarial, record-keeping or plan administrative services to Clients or the Plan.

### Educational Services to Pooled Plans

When we provide educational services to Pooled Plans, we are not acting as a fiduciary of the Plan under ERISA.

Edward Jones will provide education on plan types and work with the Platform Provider to assist with Plan setup. In order to assist Client in the consideration of a TPA, Edward Jones will provide information on the role of TPAs to Pooled Plans as well as information about the core services a TPA should provide and other factors, including a list of TPAs that have been reviewed by Edward Jones. Edward Jones will not provide recommendations for specific TPAs for Plans. Client is responsible for selecting the TPA for the Plan and is not required to select a TPA from the list provided by Edward Jones.

For Pooled Plans, Edward Jones does not provide actuarial, record-keeping or plan administrative services to Clients or the Plan.

### Item 5: Fees and Compensation

**When you participate in Retirement Plan Services, you pay fees to Edward Jones. The following section explains:**

- Who receives the fees
- When you pay the fees
- How the fees are calculated and paid
- Potential fee offsets

### Retirement Plan Services Fee Paid to Edward Jones

INCLUDED ASSETS	MAXIMUM ANNUAL FEE RATE
Up to \$1 million	75 bps
Over \$1 million to \$2 million	60 bps
Over \$2 million to \$5 million	50 bps
Over \$5 million to \$10 million	35 bps
Over \$10 million to \$20 million	25 bps
Over \$20 million to \$50 million	20 bps
Over \$50 million	15 bps

The Retirement Plan Services Fee may be discounted or reduced at the sole discretion of Edward Jones. Your Retirement Plan



Services Fee will be identified on your most current Edward Jones Employer Retirement Plan Disclosure document. Edward Jones' ability to discount or reduce the fee for Clients may result in one Client paying more or less than another Client receiving the same Retirement Plan Services.

## How the Retirement Plan Services Fee is Calculated and Paid

The Plan Sponsor will direct the Platform Provider to calculate the Retirement Plan Services Fee and pay Edward Jones on either a quarterly or monthly basis. The Retirement Plan Services Fee is calculated by the Platform Provider by multiplying the annual fee rate in the schedule above (the "Fee Schedule") by the value of the Included Assets held in the Plan in accordance with the methodology and frequency set forth in the agreement between you and the Platform Provider.

After June 30 of each year, the Platform Provider will provide Edward Jones with the value of the Included Assets held in the Plan for the most recently available six (6)-month period. Edward Jones will determine if the value of the Included Assets has increased (or decreased) such that a different annual fee rate will apply. In the event the value of the Included Assets has increased from the prior six-month period such that a lower annual fee rate applies, the Platform Provider will calculate the Retirement Plan Services Fee going forward using the lower annual fee rate. In the event the value of the Included Assets held in the Plan has decreased from the prior six-month period, Edward Jones will not increase the annual fee rate for purposes of calculating the Retirement Plan Services Fee without providing prior notice to you. This process will not be applicable for Plans where Edward Jones has been serving as the registered investment adviser for a period of less than six (6) months. Edward Jones relies on the value of the Included Assets held in the Plan that is provided by the Platform Provider for purposes of determining the applicable annual fee rate. Edward Jones does not review or verify the valuation information provided to us.

To the extent permitted and facilitated by the Platform Provider, the Plan Sponsor may choose to pay the Retirement Plan Services Fee from the Plan Sponsor's assets; Plan assets and/or other sources under the Plan's or the Plan Sponsor's ownership and control, including, but not limited to, any third-party fees attributable to the Plan's investments.

If the Plan Sponsor elects to pay the Retirement Plan Services Fee with Plan assets, the Plan Sponsor will instruct the Platform Provider to calculate and pay, or facilitate the payment by the Plan's custodian of, the Retirement Plan Services Fee owed to Edward Jones from Plan assets. Edward Jones will not accept 12b-1 fees or other revenue directly from Plan Investments.

## Other Compensation

Neither Edward Jones, its financial advisors nor any affiliate reasonably expects to receive any other compensation, direct or indirect, in connection with Retirement Plan Services. If Edward Jones receives any other compensation for such services (such as Rule 12b-1 fees or shareholder accounting revenue), Edward Jones will return such compensation to the Plan.

The Plan Sponsor or the Platform Provider will be responsible for the decision on whether fees paid to Client from Plan Investments (such as Rule 12b-1 fees or shareholder accounting revenue) and held as Plan assets will be used to pay Plan expenses.

**Rule 12b-1 Fees.** Some mutual fund companies or their affiliates pay Rule 12b-1 fees to the Platform Provider for distribution and marketing expenses with respect to fund investments held in the Plan. The Independent Investment Fiduciary or Client may direct the Platform Provider to pay an amount equal to the Rule 12b-1 fees received by the Platform Provider for all or a portion of the Retirement Plan Services Fee.

**Shareholder Accounting Revenue.** Some mutual fund companies pay shareholder accounting revenue to the Platform Provider for account record-keeping and administrative services provided by

the Platform Provider with respect to fund investments held in the Plan. The Independent Investment Fiduciary or Client may direct the Platform Provider to pay an amount equal to the shareholding accounting revenue received by the Platform Provider for all or a portion of the Retirement Plan Services Fee.

## Additional Fees and Expenses Paid to Platform Providers and Independent Investment Fiduciaries

Each Platform Provider and Independent Investment Fiduciary will charge the Plan fees and possibly expenses for their services. Please consult your agreement with your Platform Provider and your agreement with your Independent Investment Fiduciary for more information. These fees are in addition to the Retirement Plan Services Fee described above and vary depending on the particular Platform Provider and Independent Investment Fiduciary.

## Internal Fees and Expenses of Investment Options

Mutual funds have internal management fees and ongoing expenses for operating the fund (internal fees and expenses) that are deducted from the fund's assets, which has the effect of reducing the fund's net asset value ("NAV"). Many funds have different share classes with different fees and expenses. The prospectus for each mutual fund will describe the internal fees and expenses.

Exchange-traded funds, stable value funds and collective investment funds similarly have internal management fees and ongoing expenses. Internal fees and expenses are in addition to the Retirement Plan Services Fee described above and vary depending on the particular investment. Any internal fees and expenses charged by an investment will affect the investment performance of Plan Investments.

## Financial Advisor Compensation

Your financial advisor (and other Edward Jones financial advisors, to the extent they provide services to, or on behalf of, the Plan) receives a portion of the Retirement Plan Services Fee. As a result, your financial advisor has a financial incentive not to negotiate the Retirement Plan Services Fee. The portion of the Retirement Plan Services Fee paid to your financial advisor is at the discretion of Edward Jones. The fee rate paid to your financial advisor will be the same regardless of the Platform Provider or Independent Investment Fiduciary you select. As a result, your financial advisor does not have a financial incentive to recommend one provider over another.

The Retirement Plan Services Fee, as well as the amount of Included Assets, may impact your financial advisor's eligibility for a bonus.

Financial advisors are eligible to participate in the Edward Jones Travel Award Program ("Travel Award Program"), which includes domestic and international travel, or a cash award in lieu of a trip. Eligibility for the Travel Award Program is based upon the amount of new and existing assets under care of a financial advisor.

**Additional Disclosure of Services, Fees and Other Compensation: ERISA Section 408(b)(2) Disclosure.** This Brochure contains disclosures designed to assist the Plan's named fiduciary or other responsible plan fiduciaries in determining the reasonableness of the fees and compensation Edward Jones may receive as a service provider to the Plan.

Retirement Plan Services is an investment advisory program offered by Edward Jones. The services provided through Retirement Plan Services are described in Item 4 of this Brochure and in Section 2 and Appendices A and B of the Agreement.

For a description of the fees paid directly from the Plan in connection with Retirement Plan Services, please refer to "Retirement Plan Services Fees Paid to Edward Jones" above in this Item 5 and Section 3 and Appendix C of the Agreement.

Edward Jones could receive compensation from sources other than the Plan, Plan participant accounts or the Independent Investment Fiduciary in connection with the accounts or services

provided. For a discussion of other potential sources of compensation, see “Other Compensation” above in this Item 5.

Edward Jones does not charge an additional fee upon termination of the Agreement, as described in Section 6 of the Agreement.

Edward Jones and its affiliates benefit from the fees paid by Client, as further described in Item 14 of this Brochure.

## Item 6: Performance-Based Fees and Side-by-Side Management

This section does not apply to Edward Jones.

## Item 7: Types of Clients

Edward Jones offers clients a wide range of financial services. Retirement Plan Services is designed to offer advisory services to United States corporations and other organizations sponsoring employee benefit plans subject to ERISA, such as 401(k) plans, other defined contribution plans and defined benefit plans.

However, Retirement Plan Services is not a program designed to provide advisory services to SEP IRAs, SIMPLE IRAs, owner-only 401(k) plans, governmental defined contribution plans or 403(b) plans not subject to ERISA. Other investment advisory programs may be available through Edward Jones. Contact your financial advisor for more information.

There is no minimum asset requirement to participate in Retirement Plan Services.

## Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

### Platform Providers and Independent Investment Fiduciaries

Edward Jones evaluates and recommends the Platform Providers available in Retirement Plan Services based on several factors. The evaluation process starts with a limited universe of available Platform Providers identified by Edward Jones that offer the services of an Edward Jones-approved Independent Investment Fiduciary. Numerous quantitative (fees and expenses, number of clients, etc.) and qualitative (access to cutting-edge technologies needed to support Plan transactions, including record-keeping, Plan valuation, investment transactions, Plan participant and Plan Sponsor reporting, internet access, access to legal and compliance expertise, etc.) factors, based on the type of provider being monitored (either Platform Providers or Independent Investment Fiduciaries) are applied by Edward Jones in selecting and monitoring the Platform Providers and Independent Investment Fiduciaries. The selection and monitoring processes take into consideration a variety of factors, each of which may be given different weight in the decision-making process, and generally no one factor determines whether a Platform Provider is available in Retirement Plan Services.

Edward Jones will enter into an agreement with each Platform Provider indicating that Edward Jones will act as the investment adviser to retirement plans that may, in their discretion, retain the Platform Provider to provide custodial, investment, record-keeping and/or other services. The agreement will specify certain minimum services to be provided by the Platform Provider, including developing and maintaining systems and procedures to, at Client's direction, pay the Retirement Plan Services Fee owed to Edward Jones from the Plan.

Platform Providers and Independent Investment Fiduciaries undergo periodic monitoring by Edward Jones to ensure they remain suitable for Retirement Plan Services. A Platform Provider or Independent Investment Fiduciary can be removed from Retirement Plan Services for a variety of reasons, including, but not limited to, the following:

- A significant change to its personnel;
- A significant change in the quality of its services; or
- A significant change in the reasonableness of the fees charged in light of the services provided.

If a Platform Provider or an Independent Investment Fiduciary is removed from Retirement Plan Services, you must select another Edward Jones-approved Platform Provider and/or Independent Investment Fiduciary in order to continue to participate in Retirement Plan Services.

Although Edward Jones will recommend Platform Providers and Independent Investment Fiduciaries, you will be responsible for selecting the Platform Provider and Independent Investment Fiduciary.

### Plan Investments

As indicated above under “Non-Discretionary Investment Advice to Participant-Directed Plans” and “Non-Discretionary Investment Advice to Pooled Plans,” your Edward Jones financial advisor will recommend Plan Investments from among the Eligible Investment Options recommended or selected by the Independent Investment Fiduciary. Your financial advisor may consider quantitative factors (investment history, past performance, etc.) and qualitative factors (investment strategy) as part of the review of Eligible Investment Options. The recommendation process takes into consideration a variety of factors, each of which may be given different weight, and generally no one factor determines the outcome of any recommendation.

Although Edward Jones will recommend Plan Investments from among the Eligible Investment Options, Client (with assistance from its Section 3(21) investment adviser) or Client's Section 3(38) investment manager will be responsible for making the final selections of Plan Investments, including the final selections of fund share classes of certain Plan Investments, which may vary based on the expense arrangements of the Plan. Edward Jones will not continuously monitor Plan Investments.

### Risks Associated with Plan Investments

**Risk of Loss.** All investments involve risk, and the Plan Investments will fluctuate in value and, when sold, may be worth more or less than the original cost to purchase. Diversification does not guarantee a profit or protect against loss. Client and Plan participants should consider the investment objectives, risks, and charges and expenses of each Plan Investment before deciding to invest.

There is no guarantee that the Eligible Investment Options or Plan Investments will perform in any particular manner. Past performance is not a guarantee of future results. Further details about a Plan Investment can be found in its prospectus, statement of additional information, shareholder reports or annuity contract, as applicable.

Edward Jones is not responsible for the performance of an investment, the Plan or the account of a Plan participant.

**Mutual Funds Risk.** Mutual funds are diversified, professionally managed portfolios of securities that pool the assets of individuals and organizations to invest toward a common objective such as current income or long-term growth. Mutual funds are subject to investment advisory, transactional, operating and other expenses. Each mutual fund is subject to specific risks, depending on its investments. The value of mutual funds' investments and the NAV of the funds' shares will fluctuate in response to changes in market and economic conditions, as well as the financial condition and prospects of companies and other investments in which the funds invest. The performance of a mutual fund will depend on whether the fund's investment adviser is successful in pursuing the fund's investment strategy.

**Exchange-Traded Funds (“ETFs”) Risk.** ETFs are typically registered investment companies whose shares are listed on a securities exchange. An investment in an ETF generally presents the same primary risks as an investment in a conventional mutual fund (i.e., one that is not exchange-traded) that has the same investment objective, strategies and policies. The price of an ETF can fluctuate within a wide range, gaining or losing value throughout the day. ETF performance may vary from that of its benchmark or its peers. Like mutual funds, ETFs are subject to investment advisory, transactional, operating and other expenses.

Unlike mutual funds, shares of ETFs cannot be directly purchased from and redeemed by the fund.

**Money Market Funds Risk.** Money market funds are a type of mutual fund that invests in high-quality, short-term debt securities, pays dividends that generally reflect short-term interest rates and seeks to maintain a stable NAV per share (typically \$1). An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Although a money market fund is managed to maintain a stable NAV of \$1 per share, the value of the fund may fluctuate, and you could lose money.

**Stable Value Funds Risk.** The objective of most stable value funds is to provide safety of principal and an investment return that is generally higher than a money market return, while providing participants the ability to withdraw their assets for ordinary transactions at book rather than market value. However, the ability to withdraw stable value assets at book value has limitations based on the insurance contracts that wrap the underlying assets. In addition, most stable value funds require a hold period before assets can be withdrawn from the fund by the plan sponsor at book value and may refuse to honor book value withdrawals after communications from a plan sponsor or plan fiduciaries that it determines caused participants' withdrawals. Additionally, the plan is often restricted from offering investment alternatives or plans that are viewed as competitive with the stable value offering. Stable value funds are subject to counterparty risk of the insurers that provide the fund's book value liquidity.

**Collective Investment Funds Risk.** A collective investment fund ("CIF"), sometimes referred to as a collective investment trust or collective trust fund, is a bank-administered trust that consists solely of assets of retirement plans such as 401(k) plans and other defined contribution or defined benefit retirement plans that are qualified under the Internal Revenue Code of 1986, as amended.

Like mutual funds, CIFs may have a variety of investment objectives and strategies and are subject to investment and other risks. Unlike mutual funds, CIFs are not subject to the restrictions of the Investment Company Act of 1940, as amended. As a result, managers of CIFs have to disclose fund performance and the components of a portfolio only once a year, although most CIF managers communicate performance to investors on a more frequent basis.

**Cybersecurity Risk.** The computer systems, networks and devices used by Edward Jones and its service providers employ a variety of protections designed to protect against damage or interruption from computer viruses, network and computer failures and cyber-attacks. Despite such protections, systems, networks and devices potentially can be breached. Cyber-attacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of corrupting data, or causing operational disruption, as well as denial-of-service attacks on websites. Cyber incidents may cause disruptions and impact business operations, potentially resulting in financial losses, the inability of Edward Jones or service providers to trade, violations of privacy and other laws, regulatory fines, reputational damage, reimbursement costs and additional compliance costs, as well as the inadvertent release of confidential information.

## Item 9: Disciplinary Information

Edward Jones is a registered broker-dealer and investment adviser. This section contains information about certain legal and regulatory matters that Edward Jones believes are material to a client's evaluation of its advisory business or the integrity of its management. Edward Jones has also been subject to various legal and regulatory proceedings relating to its brokerage business that are disclosed in Part 1 of its Form ADV, which is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), as well as on FINRA's website at [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

**FINRA – ETFs.** In violation of FINRA Rule 2010 and NASD Rules 2110, 2310 and 3010, FINRA alleged that Edward Jones (1) failed to establish and maintain a supervisory system, including written

supervisory procedures, reasonably designed to achieve compliance with applicable NASD or FINRA rules in connection with the sale of non-traditional ETFs; (2) failed to establish and maintain an adequate supervisory system to monitor transactions in non-traditional ETFs involving retail clients; (3) did not exercise due diligence in investigating non-traditional ETFs; (4) did not ensure that its registered representatives obtained adequate information and instruction regarding traditional ETFs before recommending those products to clients; and (5) did not provide such information directly to registered representatives or require that they obtain it from other sources. FINRA also alleged that Edward Jones' supervisory system was inadequate with respect to its oversight of non-traditional ETF transactions and, until the time when FINRA issued Regulatory Notice 09-31, relied on its general supervisory procedures to oversee transactions in non-traditional ETFs. FINRA alleged that those procedures did not address the products' unique features and risks, e.g., Edward Jones' sales exception reports and other supervisory tools did not differentiate between exchange-traded equity securities, traditional ETFs and non-traditional ETFs. FINRA alleged that Edward Jones' general supervisory procedures did not require it to monitor either the length of time clients held open positions in non-traditional ETFs or the effect of long holding periods on those positions. On January 9, 2014, without admitting or denying the findings, Edward Jones entered into a letter of acceptance, waiver and consent in which Edward Jones was censured, fined \$200,000, and ordered to pay \$51,581.25 in restitution to clients.

**State of New Hampshire – Solicitation Calls.** In April 2013, the State of New Hampshire brought an action against Edward Jones, in which the allegations included solicitation calls being made in violation of applicable telephone solicitation rules, failure to properly train and supervise registered representatives in the area of telephone solicitation, and failure to establish a system and procedures reasonably designed to ensure compliance with applicable telephone solicitation rules. On February 25, 2014, Edward Jones and the State of New Hampshire entered into a Consent Agreement in which Edward Jones agreed to pay the State \$175,000 in costs, \$175,000 in contribution to New Hampshire investor education, and \$400,000 in an administrative fine, without any admission of fault or wrongdoing.

**SEC – Municipal Bond Pricing.** On August 13, 2015, Edward Jones, without admitting or denying the findings, entered into a settlement in public administrative and cease-and-desist proceedings with the SEC regarding certain of the firm's municipal securities activities. Pursuant to the settlement, the SEC alleged that Edward Jones violated Sections 17(a)(2) and (3) of the Securities Act of 1933 ("Securities Act"), Sections 15B(c)(1) and 15(b)(4)(E) of the Securities Exchange Act of 1934 ("Exchange Act"), and MSRB Rules G-17, G-11(b) and (d), G-27 and G-30(a). Edward Jones was censured and ordered to cease and desist from violating or causing any current and future violations of Sections 17(a)(2) and (3) of the Securities Act, Section 15B(c)(1) of the Exchange Act and MSRB Rules G-17, G-11, G-27 and G-30. The settlement required Edward Jones to pay \$5,194,401.37 to current and former customers of Edward Jones and to pay a civil money penalty in the amount of \$15,000,000. In entering into the settlement, the SEC considered remedial acts undertaken by Edward Jones related to this matter.

**FINRA – Mutual Fund Sales Charge Waivers.** On May 5, 2015, FINRA's Enforcement Division advised Edward Jones that it was investigating whether any violations of the federal securities laws or rules had occurred with respect to mutual fund purchases and sales charge waivers for certain retirement plan and charitable organization accounts. Prior to being advised of the investigation, Edward Jones had commenced a review of this issue and self-reported to FINRA. On October 26, 2015, Edward Jones, without admitting or denying the findings, entered into a settlement agreement with FINRA to resolve this matter. Pursuant to the settlement, Edward Jones agreed to provide remediation to certain customers, estimated at the time of the settlement agreement to be approximately \$13.5 million. A monetary penalty



was not imposed by FINRA. In reaching the settlement, FINRA recognized the extraordinary cooperation of Edward Jones, including its self-reporting of the issue to FINRA.

**FINRA – Municipal Securities Transactions Below Minimum Denominations.** On June 2, 2017, Edward Jones, without admitting or denying the findings, entered into a settlement agreement with FINRA's Department of Market Regulation in connection with its investigation of possible violations of MSRB rules regarding transactions in certain municipal securities in amounts lower than the applicable minimum denominations. As part of the settlement, Edward Jones agreed to pay a monetary fine of \$210,000.

**FINRA – Supervision of Tools-Generated Reports.** On July 13, 2017, Edward Jones, without admitting or denying the findings, entered into a settlement agreement with FINRA in connection with its investigation of the supervision of the use and dissemination of reports generated through Edward Jones' systems by financial advisors. FINRA expressly stated that its review of 65,000 reports did not reveal any instances of reports that were misleading.

FINRA also stated that Edward Jones had made changes to enhance its supervisory processes. As part of the settlement, Edward Jones agreed to pay a monetary fine of \$725,000.

## Item 10: Other Financial Industry Activities and Affiliations

You should be aware that Edward Jones, its affiliates and its financial advisors perform services for other clients outside of Retirement Plan Services, including the execution of brokerage transactions (e.g., the purchase or sale of securities or insurance products), research, the retail distribution of securities (e.g., mutual funds), the participation in principal transactions and certain underwritings and other investment advisory services. Edward Jones and its affiliates receive compensation, including fees and commissions, associated with these services. We have a financial interest in our clients' transactions and the recommendations we make to clients to buy or sell securities or investment products.

A conflict of interest exists where Edward Jones has an existing business relationship with the mutual fund families, sub-advisors, and/or Platform Providers and Independent Investment Fiduciaries that are recommended through Retirement Plan Services. Edward Jones receives revenue sharing payments from certain unaffiliated mutual fund families on client assets held outside of Edward Jones' advisory programs. "Revenue sharing" generally means a mutual fund family shares with another company, like Edward Jones, a portion of the revenue it earns through managing mutual fund assets. Edward Jones' receipt of revenue sharing outside of advisory programs creates a conflict of interest in the form of additional financial benefits to us, our financial advisors and equity owners. We believe that this conflict of interest is mitigated through internal policies designed to prevent Edward Jones, in its capacity as investment adviser, and any affiliated investment adviser, from considering revenue sharing from existing business relationships when recommending certain investment options and/or Platform Providers or Independent Investment Fiduciaries.

For more information regarding revenue sharing, please visit [www.edwardjones.com/disclosures](http://www.edwardjones.com/disclosures) or request a revenue sharing disclosure document from your Edward Jones financial advisor. Edward Jones does not receive revenue sharing related to Plans participating in Retirement Plan Services. Edward Jones and its financial advisors also receive compensation for services and recommendations that may differ from advice given to you while participating in Retirement Plan Services.

In its capacity as a broker-dealer, Edward Jones performs research and distributes recommendations to buy, sell or hold the equity securities of asset management companies or financial institutions with asset management affiliates that may be recommended Platform Providers or Independent Investment Fiduciaries in Retirement Plan Services. In order to preserve the independence

of this process and to address any conflicts of interest, we have adopted a policy under which we do not consider our opinion on equity securities of asset management companies or financial institutions in recommending Platform Providers or Independent Investment Fiduciaries.

The following summarizes Edward Jones' material relationships or arrangements with other entities that participate in the financial industry.

Edward Jones is the primary operating subsidiary of JFC, is dually registered with the SEC as an investment adviser and broker-dealer, and is a member of FINRA.

Olive Street Investment Advisers, LLC, a subsidiary of JFC, is registered as an investment adviser with the SEC and serves as the investment adviser of certain affiliated mutual funds. Certain current or former associates of Edward Jones serve as officers or directors/trustees of the affiliated investment adviser and/or the affiliated mutual funds.

Edward Jones' Canadian operating subsidiary, an Ontario, Canada, limited partnership (Edward Jones in Canada), is a broker-dealer registered with the Investment Industry Regulatory Organization of Canada.

Edward Jones Trust Company ("EJTC"), a wholly owned subsidiary of JFC, is a federally chartered savings and loan association that offers personal trust and investment management services. EJTC also acts as custodian for certain traditional and Roth IRAs through an agreement between Edward Jones and EJTC.

Edward Jones owns directly or indirectly 100% of three insurance agencies that conduct insurance-related activities in the U.S.: Edward Jones Insurance Agency of New Mexico, L.L.C., a New Mexico limited liability company; Edward Jones Insurance Agency of Massachusetts, L.L.C., a Massachusetts limited liability company; and Edward Jones Insurance Agency of California, L.L.C., a California limited liability company.

Edward Jones indirectly owns 100% of two insurance agencies that conduct general insurance-related activities in Canada: Edward Jones Insurance Agency (Quebec) Inc., a Canadian corporation; and Edward Jones Insurance Agency, an Ontario, Canada, limited partnership.

Edward Jones owns 7% of Customer Account Protection Company Holdings, Inc. (CAPCO), a captive insurance group.

Edward Jones is the direct or indirect owner of 100% of Passport Research, Ltd., a Pennsylvania limited partnership that acts as the investment adviser to the Edward Jones Money Market Fund.

## Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Edward Jones has established a Code of Ethics to ensure that our associates:

- act with integrity and in an ethical manner with you and all of our clients;
- place your and all of our clients' interests first;
- conduct personal trading in compliance with our Code of Ethics, avoid potential conflicts of interest and make sure they do not abuse the faith and trust you have placed in them;
- comply with all applicable rules, regulations and laws; and
- do not use any material nonpublic information they may receive as a result of their employment with Edward Jones.

Some Edward Jones associates are deemed "access persons" under our Code of Ethics because they may have access to nonpublic information regarding either the securities in Clients' accounts or changes to our advisory programs, including asset allocations. Under our Code of Ethics, Edward Jones access persons must receive prior approval before acquiring a beneficial ownership interest in any security in an initial public offering,

limited offering or hedge fund transaction. Additionally, access persons are required to submit to the chief compliance officer, or his or her delegate, a list of any securities they own and securities transactions they made for any account they control at Edward Jones or another financial institution. You may request a copy of the Edward Jones Code of Ethics from your financial advisor.

Edward Jones has internal supervisory reviews and procedures to review accounts held by our associates and certain family members and their personal trading practices. The reviews look for improper trading activities, including trading that may be in conflict with the best interests of a client. In addition to the Code of Ethics and the supervisory reviews, Edward Jones prohibits financial advisors from placing trades for their personal accounts before Edward Jones executes trades for our clients in the same security. As noted in Item 12 below, the Platform Provider will be responsible for executing trades for Retirement Plan Services.

### Item 12: Brokerage Practices

Edward Jones will not execute trades for Clients participating in Retirement Plan Services. Generally, the Platform Provider will provide trade execution services for the Plan for a fee.

### Item 13: Review of Accounts

Your Edward Jones financial advisor will perform an annual review with you as the Plan Sponsor of a Participant-Directed Plan, which may include a review of the following: the Platform Provider and Independent Investment Fiduciary and fees charged by each party; current platform and services offered by the Platform Provider; Plan participation, contributions and demographics; Plan Investments; and the qualified default investment alternative ("QDIA") selection.

Your Edward Jones financial advisor will perform an annual review with you as the Plan Sponsor of a Pooled Plan, which may include a review of the following: the Platform Provider and Independent Investment Fiduciary and fees charged by each party; current platform and services offered by the Platform Provider; Plan contributions and demographics; Plan Investments; whether a defined benefit Pooled Plan is meeting its investment objectives; and a review of a defined contribution Pooled Plan's current investment lineup in accordance with Edward Jones' asset class guidance.

### Item 14: Client Referrals and Other Compensation

From time to time, Edward Jones and its financial advisors receive client referrals or potential client leads from third parties. Edward Jones and its financial advisors pay for these referrals and leads. Although Edward Jones and its financial advisors are not precluded from entering into other types of solicitor arrangements, currently, client referrals result from an individual providing information to a third-party solicitor and subsequently being matched with an Edward Jones financial advisor (and, in certain cases, financial advisors associated with financial institutions other than Edward Jones).

Pursuant to SEC Rule 206(4)-3, Edward Jones and its financial advisors enter into a written agreement with each solicitor and pay the solicitor a fee for the referrals. The purchase of client leads, by Edward Jones and its financial advisors, from third parties does not involve solicitation or referrals to Edward Jones.

Payments to solicitors for referrals and to other third parties for leads, along with any other costs associated with these arrangements, are paid entirely by Edward Jones and its financial advisors and are not dependent on whether a referral or lead becomes an Edward Jones client.

Edward Jones does not receive compensation from Platform Providers or Independent Investment Fiduciaries participating in Retirement Plan Services.

Certain unaffiliated mutual fund companies and/or ETF sponsors (or their investment advisers) and Platform Providers pay certain expenses on behalf of financial advisors, including training and educational expenses, and in some instances make payments directly to Edward Jones to subsidize training and educational costs for financial advisors. These companies also participate in conferences or other marketing activities with Edward Jones and generally share in the cost of those activities as well. Edward Jones has not entered into any agreement with any ETF or mutual fund (or its investment adviser or its distributors or affiliates) providing for payment of such expenses as a condition of recommending a Plan Investment or a Platform Provider. Our financial advisors are not allowed to consider an advisory product partner's sponsorship of a marketing activity when recommending a Plan Investment or a Platform Provider for Retirement Plan Services.

### Item 15: Custody

Edward Jones does not provide custody services in connection with Retirement Plan Services. Generally, the Platform Provider will provide custody services for a fee.

### Item 16: Investment Discretion

Edward Jones has no discretion over the investment of Plan assets and has no discretion to interpret the Plan documents, to determine eligibility or participation under the Plan, or to take any other action with respect to the management, administration or any other aspect of the Plan.

Edward Jones does not provide legal or tax advice. You should consult with your legal or tax professional before participating in Retirement Plan Services.

You or Edward Jones may terminate your participation in Retirement Plan Services at any time by providing sixty (60) days' prior written notice. If you terminate your contractual relationship with the Platform Provider or Independent Investment Fiduciary without selecting and entering into an agreement with an appropriate replacement Platform Provider or Independent Investment Fiduciary, Edward Jones will terminate your Agreement. Additionally, if the Platform Provider is removed from Retirement Plan Services by Edward Jones, you must contact your financial advisor and select a Platform Provider available in Retirement Plan Services. If you do not select an available Platform Provider within the time frame established by Edward Jones, Edward Jones will terminate your participation in Retirement Plan Services. If you or Edward Jones terminate your participation in Retirement Plan Services, the Plan will be charged the Retirement Plan Services Fee through the date of termination.

### Item 17: Voting Client Securities

Edward Jones will not be responsible for voting (or recommending how to vote) proxies for Clients participating in Retirement Plan Services. Client or, if applicable, Plan participants will be responsible for voting proxies of Plan Investments.

### Item 18: Financial Information

This section does not apply to Edward Jones.

### Item 19: Requirements for State-Registered Advisers

This section does not apply to Edward Jones.