Retirement Advice Disclosure

PTE 2020-02
October 2026

When we provide investment advice to you regarding your retirement plan account ("Plan") or individual retirement account ("IRA"), we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and the Internal Revenue Code (the "Code"), as applicable, which are laws governing retirement accounts. The way Thrivent Advisor Network, LLC. ("TAN," "we," "us," or "our") and your TAN investment adviser representative ("Advisory Persons") make money creates some conflicts with our client's ("Retirement Investors," "you," or "your") interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

When provided with advice regarding your Plan or IRA from your Advisory Persons, including rollover recommendations into our investment advisory services, it will be in your best interest and suitable based on what you tell us about your investment objectives, financial circumstances, and needs.

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Services

TAN is registered as an investment adviser with the Securities and Exchange Commission ("SEC"). As a registered investment adviser, it does not separately maintain a bond pursuant to section 412 of ERISA.

Our Advisory Persons can provide investment advisory services to Retirement Investors. Depending on the service, TAN offers investment management services where Retirement Investors receive ongoing investment advice, and may or may not separately pay for securities transactions and brokerage-related fees.

Investment Advisory Services

We provide investment advisory ("Advisory") services to Retirement Investors that include investment management, retirement plan, and financial planning and consulting services.

Our investment management services are offered on both a discretionary and nondiscretionary basis through our Advisory Persons. Our Advisory Persons may also engage the advisory services of affiliated and unaffiliated investment managers (herein "Independent Managers"). You will receive ongoing investment advice, brokerage, and related services for an asset-based fee (i.e., a wrap fee program) or separately pay for securities transactions and brokerage-related fees (i.e., non-wrap fee program). For our discretionary programs, either your Advisory Persons and/or an Independent Manager will construct model portfolios and implement investment transactions without your prior approval. For our nondiscretionary programs, you make the ultimate decision regarding the purchase or sale of investments. You are required to select the broker-dealer/custodian (the "Custodian") for execution and custody services for your advisory account assets. We primarily limit our investment advice to low-cost, diversified mutual funds and exchange-traded funds, but may also utilize individual equities, bonds, limited partnerships, and other types of securities, as appropriate. We also provide investment advice with respect to our affiliates' proprietary products. Independent Managers may limit the type of investments available in their model portfolios, including the use of the Independent Managers' proprietary products. At least annually, we monitor portfolios and securities in your advisory accounts as a standard service. We do not require account or relationship size minimums for you to open or maintain an account or establish a relationship with us; however, minimum account sizes may be imposed by certain Advisory Persons and Independent Managers.

We also offer nondiscretionary retirement plan advisory services to plan sponsors and participants. Reviews of these services occur at least annually as a standard service and depending upon need. In addition, we offer ongoing and project-based Financial Planning and Consulting Services based on your financial goals, objectives and unique situation.

Interested in learning more about our services?

Review our Form CRS Relationship Summary, Wrap Fee Program and Investment Management Services (Non-Wrap) Brochures, and/or Financial Planning and Consulting Services Brochure on Thriventadvisornetwork.com for more information.

Rollovers

Rolling over assets from your Plan into an IRA with us may be one of the most important financial decisions that you make and can have long-term impacts on your retirement security. This decision should only occur after careful consideration of various factors, the importance of which will vary based on your specific situation.

Additionally, if you are under the age of 59½, the Internal Revenue Service generally will consider payouts as an early distribution. This means that you could owe a 10% early withdrawal penalty on top of federal and applicable state and local taxes. TAN and our Advisory Persons do not provide legal, accounting, or tax advice. You should consult your own attorney or tax professional.

Rollovers from your Plan

You generally have four choices concerning the assets in your Plan:

- Keep some or all your retirement savings in your former employer-sponsored Plan.
- Transfer the assets into your new employer-sponsored Plan.
- Roll over your Plan assets into an IRA.
- Cash out your balance.

Consider the following factors before rolling over assets from your Plan:

	Plans	**IRAs**
Investment Options	• Typically provides a limited menu of investment options. • May offer a self-directed brokerage account or brokerage window which may also provide you with additional investment options.	• Depending on the IRA, you may have a broader range of investment options than available from your Plan.
	The importance of this factor will depend in part on how satisfied you are with the options available with the Plan under consideration. For example, if your Plan offers low-cost institutional funds and you are satisfied with these investments, then you may not consider an IRA's broader array of investments as an important factor.	
Employer Stock	• If you take a distribution from a Plan in which you hold employer stock, your distribution may be subject to capital gains tax rates, which likely will be lower than ordinary income tax rates that would be charged if you took a distribution from an IRA.	• If employer stock is rolled in-kind to an IRA, stock appreciation will be taxed as ordinary income on distribution.
	If you hold significantly appreciated employer stock in a Plan, then you should consider the negative tax consequences of rolling the stock into an IRA.	
Services	• Some Plans provide access to investment advice, discretionary managed account services, planning tools, telephone help lines, educational materials, and workshops. • Depending on your Plan, your account balance may be directly charged for one or more of these services or the Plan may pay for one or more of these services and thus the cost of the services to you may be less because all of the participants pay for the services.	• Some IRA providers offer different levels of service, which may include full brokerage service, investment advice, distribution planning, and access to securities execution online. • Depending on the services provided, IRA providers may charge higher fees and expenses than your Plan. In addition, you pay all related fees and expenses.

	Plans	IRAs
Penalty-Free Withdrawals	• If you leave your job between the age of 55 and 59½, you may be able to take penalty-free withdrawals from your Plan. • Some Plans may have loan provisions that allow you to take a loan from your account. The loan amount is not taxable or subject to the 10% federal penalty tax if loan requirements are met. • Your Plan may allow you to take withdrawals in the event of a hardship though they may be subject to an additional tax. • Some Plans offer lifetime income options. Rollovers from your Plan may either result in either a termination or reduction in the lifetime income stream depending on the type of rollover that is undertaken. • The SECURE Act of 2019 added a penalty exception for distributions related to the birth or adoption of a child if the Plan adopts these provisions.[2]	• Penalty-free withdrawals generally may not be made from an IRA until age 59½. • Loans are not available from IRAs. • IRA distributions that are used for certain nonretirement purposes, like purchasing a first-time home[1] or qualified education expenses, are exempt from the 10% federal penalty tax that typically applies to distributions taken prior to age 59½. • The SECURE Act of 2019 added a penalty exception for distributions related to the birth or adoption of a child.[2]
	You should consider when you will need to have access to your retirement Plan assets and whether the Plan or IRA will better meet those needs.	
Protection from Creditors and Legal Judgments	• Plan assets generally have unlimited protection from creditors under federal law.	• State laws vary in the protection of IRA assets in lawsuits. In general, IRA assets are only protected in bankruptcy proceedings.
Required Minimum Distributions	• The SECURE Act 2.0 revised the RMD rules. In general, you must start taking RMDs by April 1 of the year after you turn 73. • If a Retirement Investor is still working and reaches RMD age, they are generally not required to take RMDs from their current Plan, if the plan document allows for the delay. This rule does not apply to individuals who are 5% or more owner of the business.	• The SECURE Act 2.0 revised the RMD rules. In general, you must start taking RMDs by April 1 of the year after you turn 73. • In an IRA, you do not have the option of delaying a RMD even if you continue to be employed.
Fees and Expenses	• Investment-related expenses that may include sales loads, commissions, the expenses of any mutual funds in which assets are invested, and investment advisory fees. • Charges Plan fees which typically include Plan administrative fees (e.g., recordkeeping, compliance, trustee fees) and fees for services such as access to a customer service representative. • Depending on your Plan, some of these charges and expenses may be charged to your account directly, while others may be shared by all of the participants in the Plan, including you.	• Investment-related expenses that may include sales loads, commissions, the expenses of any mutual funds in which assets are invested and investment advisory fees. • Charges fees and expenses which typically include administrative, account set-up, and custodial fees. • All such charges and expenses are paid by your IRA.

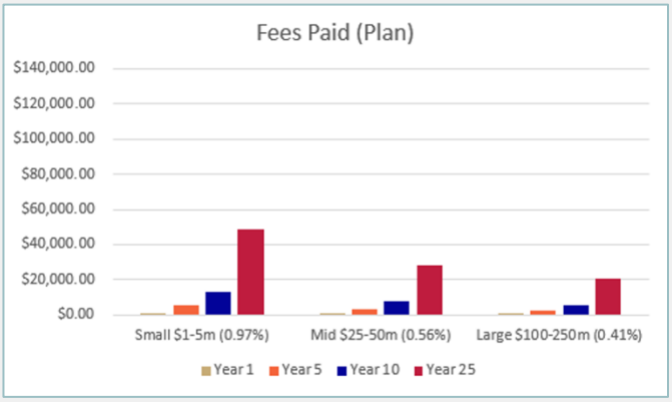
[1]No penalty on up to $10,000 of distributions you receive to buy or build a first home. You qualify for a first-time home purchase if you and your spouse have not owned a home in the previous two years.

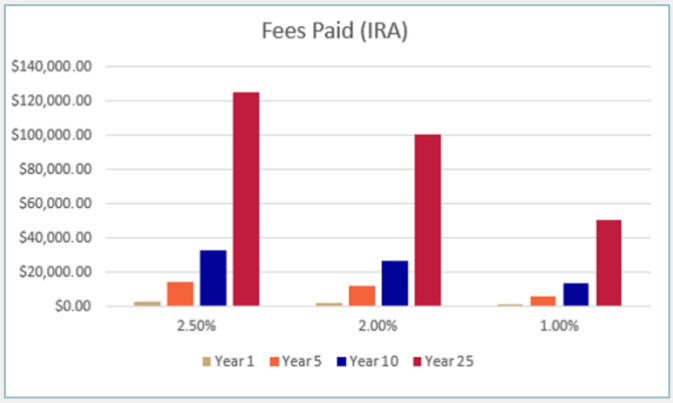
[2]Distribution of up to $5,000 taken within one year of the birth or adoption of a child is exempt from the penalty.

Effect of Fees and Expenses

Fees and expenses accumulate over time and assets used to pay fees and expenses are no longer available to you to save for or use in retirement. Before rolling over your Plan assets into an IRA, you should carefully review your Plan's documentation and understand your specific fees and expenses. We strongly encourage you to provide this information to your Advisory Persons.

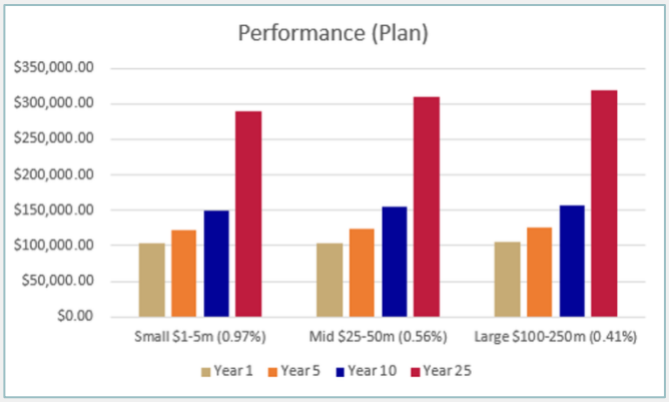
The following charts illustrate the performance of hypothetical $100,000 portfolios experiencing 5% annual returns at 1-, 5-, 10-, and 25-year intervals but with *different fees*. When compared to Plans, notice how the fees accumulate faster over time in IRAs which generally have higher fees and expenses.

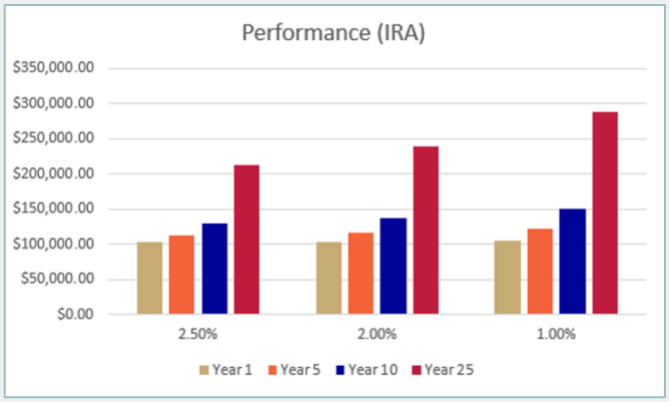




Illustrative purposes only. Information does not represent any particular investment, actual market performance, or other factors which should be considered. Investing involves risk, including the potential loss of principal invested. Plan fees are based on Morningstar benchmark data and represent both Plan level fees and investment expenses. Actual fees will vary based on specific Plan, products, product features selected, and service(s) provided. Refer to Plan and/or product/offering documents for specific fee information.

Fees and expenses will adversely affect the overall performance of your Plan or IRA. Higher fees and expenses will result in a greater impact on your investment performance, especially over time, and should be carefully considered before rolling over assets. The following charts illustrate the performance of the same previous portfolios for the same period less the noted fees that were paid. Notice how the fees affect the investment portfolios after 25 years.





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Before rolling over assets from your Plan, remember that those assets will no longer enjoy the benefits and features of your Plan. Carefully review your Plan documents and discuss with your Advisory Persons before rolling assets out or taking a distribution from your Plan. Make sure you understand the reason(s) for a distribution or rollover transaction.

Affiliations

Thrivent Financial Holdings, Inc., the parent company of TAN, also has other subsidiaries that engage in activities that may be material to our Advisory business and you. Information about how they work together to offer you financial products and services is provided below.

- **Thrivent Financial for Lutherans ("TFL")** markets life, health and disability insurance to Christians in all 50 U.S. states and the District of Columbia and is also a registered investment adviser. Thrivent Financial for Lutherans is the parent company of Thrivent Financial Holdings, Inc.
  - **Thrivent Investment Management Inc. ("TIMI")** is registered as an investment adviser, broker-dealer, and member of FINRA/SIPC. TIMI offers dedicated planning services and managed accounts programs to clients. In its capacity as broker-dealer, it actively markets mutual fund shares, variable insurance contracts and general securities to its clients through its registered representatives. It also serves as the principal underwriter and distributor of variable annuities and insurance issued by TFL. Certain Advisory Persons are also registered representatives of TIMI. As a registered representative of TIMI, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendations provided by the Advisory Person.
- **Thrivent Asset Management, LLC** is the registered investment adviser providing portfolio management and fund administration services to Thrivent Mutual Funds and Thrivent Core Funds.
- **Thrivent Distributors, LLC** is the principal underwriter and distributor for Thrivent Mutual Funds.
- **Thrivent Insurance Agency, Inc.** is a life, health and annuity insurance general agency engaged in the distribution of life, health and annuity products from multiple insurers.



- **Thrivent Trust Company** serves as a federal savings bank offering professional fiduciary and discretionary investment management services.
- **Thrivent Financial Investor Services Inc.** provides transfer agent and shareholder services for Thrivent Mutual Funds, Interval Funds, Series Funds, Core Funds, and Cash Management Trust.
- **Thrivent Bank** is an indirect, wholly owned subsidiary of Thrivent Financial for Lutherans and serves as an FDIC-insured, Utah industrial bank offering deposits, loans and other banking services.

Conflicts of Interest

The receipt of compensation (either directly or indirectly) creates a conflict of interest between us and you. We manage this conflict through our policies and procedures, conducting due diligence reviews of the products and services that can be recommended, disclosing material conflicts to clients and prospective clients and by training our Advisory Persons, including on the need to act in your best interest. Below are material conflicts of interests related to us providing advice to you regarding your Plan or IRA:

- It is more profitable for us to sell products issued by TFL and its affiliates than those issued by other companies. As a result, we have a financial incentive to recommend them over other companies' products.
- We maintain relationships with custodians through which we receive economic benefits (e.g., recruiting and training support services for Advisory Persons, expense reimbursement, software, and related support services without cost, and payment for marketing, technology, consulting or research expenses). As a result, we have an incentive to recommend these custodians to you and encourage you to increase the assets in your advisory account with these custodians. In addition, Advisory Persons may cover certain custodial fees assessed to you by the custodians. This creates a conflict of interest, as fees could be absorbed for some clients and not others. We manage this conflict by training our Advisory Persons on their fiduciary duty to act in the best interest of their clients as well as reviewing such activity on a regular basis.
- We will provide marketing opportunities to certain affiliated and unaffiliated strategic partners that provide marketing allowances and expense reimbursements to TAN. These marketing allowances and expense reimbursements are not shared with Advisory Persons. This results in a conflict of interest because we have an incentive to use certain strategic partners over others based on this arrangement.
- When you invest in Thrivent Mutual Funds and/or Thrivent Exchange-Traded Funds ("Thrivent ETFs"), our affiliate Thrivent Asset Management receives fees (including revenue sharing) for serving as the Investment Manager for the mutual funds and Thrivent ETFs and for providing administrative and accounting services to the funds pursuant to an Administrative Services Agreement. A conflict of interest exists when an Advisory Person recommends or elects to purchase a Thrivent Mutual Fund and/or Thrivent ETF in your advisory account.

Your Advisory Person may receive other compensation for providing you with recommendations and/or services. Receipt of compensation (either cash or non-cash compensation) creates conflicts of interest between you and your Advisory Person. We manage these conflicts by training our Advisory Persons on their need to act in your best interest and through our policies and supervisory procedures. The amount and type of compensation paid to your Advisory Persons varies and depends on, among other things:

- The products and/or services recommended to you.
- If you actually invest in an account and the length of time that you are otherwise invested with us.
- Total volume of product sales, length of time that you keep assets invested in the products sold, and the profitability of the products.
- If you purchase or invest in a proprietary product versus a nonproprietary product.

Your Advisory Person may not receive any or all of the specific types of compensation described in this disclosure. You can ask your Advisory Person for further details about the actual compensation he or she receives. Following are different forms of compensation certain personnel and your Advisory Person could earn while providing investment advice to you regarding your Plan or IRA:



Interested in learning more about our conflicts of interest?

Review our Form CRS Relationship Summary, Wrap Fee Program and Investment Management Services (Non-Wrap) Brochures, and/or Financial Planning Services and Retirement Plan Advisory Services Brochure on Thriventadvisornetwork.com for more information.

- Your Advisory Person receives a portion of the fees and charges that you pay when you invest your rolled over retirement assets (e.g., employer-sponsored 401(k) plan) with us based on their recommendation.
- Advisory Persons and field personnel may receive additional compensation or other economic benefits; such as, sales awards (cash and non-cash), recruiting and training support services, expense reimbursement, software, bonuses, non-cash compensation (e.g., financial services industry and other recognition events) for providing products, services, and/or client retention. This creates an incentive for Advisory Persons to recommend products or services to you, increase the assets in your advisory account, and not negotiate lower fees for your account.
- Advisory Persons receive a portion of the fees that you pay. This means Advisory Persons have an incentive to encourage you to increase the assets in your advisory account, and also have an incentive not to negotiate lower fees for your account.
- Some of our Advisory Persons are also registered representatives of TIMI, which allows our Advisory Persons to earn commissions and creates an incentive for our Advisory Persons to sell more investment products as registered representatives of TIMI.
- Some of our Advisory Persons are licensed insurance agents and receive compensation for the sale of insurance products, which creates a financial incentive for your Advisory Persons to recommend that you purchase insurance products.
- Advisory Persons may be eligible to receive compensation for referring individuals who become Advisory Persons of TAN, which creates an incentive for Advisory Persons to refer individuals to receive a referral fee and a portion of Advisory Fees.
- Advisory Persons also refer prospective clients or clients to other Advisory Persons and receive a portion of the fees for the services provided, which creates an incentive for Advisory Persons to refer clients to other Advisory Persons.
- Thrivent Trust Company pays Advisory Persons a fee for referring clients to Thrivent Trust Company for its professional personal trust, estate and investment management services, which creates an incentive for Advisory Persons to refer clients to Thrivent Trust Company. When the Advisory Person provides investment management services to Thrivent Trust Company for the referred client, the Advisory Person will not receive a referral fee in addition to the investment management fee.
- Some Advisory Persons are eligible to receive a cash bonus from their team practice based on asset growth earned by the whole team. This means Advisory Persons have an incentive to increase the assets in your advisory account, and also have an incentive not to negotiate lower fees for your account.
- Some Advisory Persons may receive a loan from TAN and/or its affiliates to invest in their team. The loan may provide for partial or full loan forgiveness if the Advisory Persons and/or their team exceed targeted sales of investment advisory services and/or other products. This creates an incentive for Advisory Persons to encourage you to increase the assets in your advisory account and not to negotiate lower fees for your account.
- Our affiliates and third-party companies, including but not limited to third parties whom we have existing relationships with (i.e., Platform Manager, Model Providers, Product Sponsors, etc.) pay for some events during which Advisory Persons learn about products and services offered by TAN and its affiliates, and third-party companies. Costs include, but are not limited to, training materials, travel, lodging and meals. They also pay for certain educational events for clients or prospective clients. Costs include, but are not limited to, room rental, presentation materials, meals, entertainment/leisure outings and promotional gifts. This results in a conflict of interest because we have an incentive to use certain third-party companies over others based on this arrangement.
- Thrivent Charitable Impact & Investing™ (“Thrivent Charitable”) allows some Advisory Persons to provide investment advisory and management services for donor advised funds at Thrivent Charitable. Advisory Persons who are approved to offer these services will receive compensation for such services. In addition, Advisory Persons are eligible to receive additional compensation from Thrivent Charitable through programs that recognize Advisory Persons for facilitating gifts to Thrivent Charitable. This additional compensation includes public recognition (e.g., client mailings and marketing materials) and eligibility for a budget to co-host an event with Thrivent Charitable based on specific thresholds of gifts facilitated during the year and/or over the course of the Advisory Person's career. In a separate agreement, Thrivent Charitable partners with TAN and TFL. TFL pays your Advisory Persons for their work in bringing donor gifts to Thrivent Charitable to the extent these donor gifts are invested in a donor-advised fund available through Thrivent Charitable. Advisory Persons who provide investment management services to Thrivent Charitable for the referred client will not receive a referral fee in addition to the advisory fee. These arrangements create an incentive for Advisory Persons to facilitate charitable gifts to Thrivent Charitable rather than another charity. Thrivent Charitable is not an affiliate of TAN.
- Advisory Persons may own their own business entities through which they market and deliver advisory services, and may provide services other than those offered through TAN.

Investment advisory services offered through Thrivent Advisor Network, LLC., (herein referred to as “TAN”), a registered investment adviser. Clients will separately engage an unaffiliated broker-dealer or custodian to safeguard their investment advisory assets. Review the Thrivent Advisor Network Financial Planning Services and Retirement Plan Advisory Services, Investment Management Services (Non-Wrap) and Wrap Fee Program brochures (Form ADV Part 2A and 2A Appendix 1 brochures) for a full description of services, fees and expenses, available at Thriventadvisornetwork.com. Certain Thrivent Advisor Network’s Advisory Persons offer securities products as registered representatives of its affiliate, Thrivent Investment Management Inc., a broker dealer, registered investment adviser, member FINRA and SIPC, and a subsidiary of Thrivent, the marketing name for Thrivent Financial for Lutherans.

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