

Introduction

This handbook provides important information to help you understand the type and scope of products and services available through COUNTRY Financial®, the standard of care we owe to you, material fees and costs that may apply, and conflicts of interest associated with a recommendation. COUNTRY Trust Bank® (CTB), COUNTRY® Capital Management Company (CCMC), and COUNTRY Investors Life Assurance Company® (CILAC) [collectively referred to as the “companies”, “we”, “our”, or “us”] are a part of a family of affiliated insurance and financial services companies operating under the COUNTRY Financial trade name.

Please read this information carefully and retain it for your records. If you have any questions regarding this information or to request a current copy of this handbook, please contact your financial professional or our home office in Bloomington, Ill. at 1-866-COUNTRY. You can also find a current copy of this handbook at COUNTRYFinancial.com/financial-handbooks.

Please note that you may receive marketing material from us based on our discussion with you on the types and scope of products and services provided.

Information contained in this handbook is current as of August 2023 and supersedes prior handbooks you may have received.

Our commitment to you

We put the client at the center of everything we do. Depending on the type of products and services we offer, we have various regulatory obligations concerning the standard of care that we provide. We may be considered fiduciaries when providing certain services on behalf of the companies. For example, when we provide Investment Advice to you regarding your qualified retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. Additionally, for certain products and services, we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. For information about what standard of care applies to a specific product, please see the applicable entity and product information enclosed.

Under our commitment to you, 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;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Regardless of which of the following products and services we provide, we will meet the standard of care that is appropriate. This acknowledgment is not intended to create or modify any agreement, relationship, or obligation we may have to you under other federal and state laws governing the provision of advice to retail investors.

Product and Service Offerings

We recommend products and services based on your financial goals and needs. Refer to the chart below and ask your financial professional questions about reasonably available alternatives and where to find additional information about these products:

Company Name	Company Type	Products and Services offered	For Additional Information
COUNTRY Trust Bank®	A limited purpose federal savings bank	Investment Management, Investment Advice, Business Retirement Services, Trust Services, Financial Planning	Refer to the attached COUNTRY Trust Bank® Client Handbook

Continued on next page

Company Name	Company Type	Products and Services offered	For Additional Information
COUNTRY® Capital Management Company	A limited purpose registered broker/dealer and state licensed insurance agency	529 College Savings Plans, Fixed Annuities, Mutual Funds, Variable Annuities	Refer to the attached Form CRS, Investor Handbook, and COUNTRY® Capital Management Company Fixed Annuity Handbook
COUNTRY Investors Life Assurance Company®	A state licensed insurance company	Fixed Annuities	Refer to the attached COUNTRY Investors Life Assurance Company Annuity Handbook

The products and services listed above have different benefits, features and risks and are subjected to various regulatory obligations. It is important for you to refer to the supplemental handbooks for information that relates to specific products and services.

Fees and Expenses

When pursuing your financial goals, it's important that you not only consider the benefits and risks of an investment, but also the cost. As with anything you buy, there are fees and expenses associated with the products and services that we offer. Some products, such as fixed annuities, may have little to no fees and expenses; while other products, such as mutual funds, incur annual ongoing costs, which can include management, marketing or servicing expenses. These expenses are deducted from the fund's assets, which impacts returns over time. It's important for you to understand that even a small amount of ongoing fees and expenses can significantly reduce your investment's return over time. For example, as shown in the chart below, if an investor makes a \$10,000 purchase of a hypothetical investment and holds it for 30 years, assuming an annual return of 5%, the ending value will be over \$22,000 more if the annual fee is 0.25% compared to 3.0%.

While fees are an important consideration, please note that the following chart is a hypothetical investment that does not take into account the differences between products and services that have different fee levels. Generally speaking, products and services with higher fees may provide additional features or higher service levels.

Example of annual fee impact		
Annual fee	Value after 30 years	Fees charged
0.25%	\$40,237	\$2,980
0.5%	\$37,453	\$5,766
1.0%	\$32,434	\$10,783
2.0%	\$24,273	\$18,946
3.0%	\$18,114	\$25,105

Many products charge a transaction-based fee every time you make a purchase, which is often called a "sales charge" or "sales load." Sales loads can be front-end in that they are assessed at the time you make your investment or back-end in that you are assessed the charge if you sell the investment, usually within a specified time frame. To demonstrate the effect of fees and expenses, the table below shows the values of a hypothetical investment of \$10,000 with a 5% annual rate of growth using different up-front sales charges and annual expenses similar to the costs described above.

Example of sales charge and annual expense impact				
Cost (in percentages of investment)		Holding period (in years)		
Up-front charges	Annual expenses	1	5	15
0%	0.25%	\$10,475	\$12,612	\$20,059
0%	0.65%	\$10,435	\$12,373	\$18,940
0%	4.0%	\$10,100	\$10,510	\$11,610
3.5%	0.65%	\$10,070	\$11,940	\$18,277
5.75%	0.65%	\$9,835	\$11,661	\$17,851

It's important for you to review the fees and expenses of the product or service you are purchasing. Please carefully review each entity's handbook for how fees and expenses will impact your purchase. While we and our financial professionals have knowledge and tools that can evaluate the fees and expenses associated with your financial situation, we will also be relying on you to provide us with further information to determine the appropriateness of our recommendation. However, your financial professional has not independently verified any non-internal information, and your financial professional is not responsible for any incorrect information you have provided (for example: email address statement or entry errors). Please review this information carefully and discuss any questions you may have with your financial professional.

What to expect when you are doing business with us

Our services are made available through financial professionals who are trained, supervised and authorized to work with you on our behalf. Your financial professional may ask you a lot of questions; it is important for you to provide complete and accurate information in order for us to offer you the most appropriate options for your situation. Answer as honestly and openly as you can, and if you don't know the answer, your financial professional will work with you to figure it out. Depending on the products and services recommended, our recommendations may be required to meet fiduciary, suitability, or best interest standard of care. Regardless of the standard of care we will work with you to achieve your goals and objectives, based on your financial and tax status, and other financial information you have provided to us.

We strongly encourage you to talk to your financial professional periodically and whenever your circumstances change, as some changes may affect the products or strategy you and your financial professional have put in place. Our silence should not be viewed as a recommendation. Your financial professional will not provide you with tax or legal advisory services, and no one associated with us is authorized to render such advice as a service provided through us. You are encouraged to consult a tax and/or legal advisor to determine the appropriate tax/legal treatment of your transactions.

4 Rollover Options

A decision to roll over plan assets, such as in a 401(k) or 403(b), should reflect consideration of various factors, the importance of which will depend on your individual needs, circumstances and options. Our financial professional, when providing advice regarding a rollover, does not represent the Plan or the employer. You generally have four options when considering a rollover from a 401(k) plan:

- Option 1:** Leave the assets in your former employer's plan, if permitted;
- Option 2:** Roll over the assets to your new employer's plan, if one is available and rollovers are permitted;
- Option 3:** Roll over the assets to an IRA;
- Option 4:** Cash out the account value.

Each choice above offers advantages and disadvantages, depending on desired investment options, tax treatment, your unique financial needs and retirement plans and your desire for access to a financial professional.

- Investment Options and Services:** By choosing option 3, you may have access to additional investment options as well as access to financial advice and other services which may not be offered by an employer plan.
- Fees:** By choosing option 1 or 2, generally fees and expenses are lower than if you were to choose option 3. If you choose option 3, and roll over assets to a service of COUNTRY Trust Bank®, our financial professional will receive compensation and your costs may be higher than in your employer's plan.

- **Withdrawals:** If you choose option 4, withdrawals prior to 59 1/2 may be subject to an IRS penalty and taxed as ordinary income. Withdrawals from option 1 or 2 made between ages 55 and 59 1/2 may be penalty free. Options 1, 2 and 3 require periodic withdrawals of certain minimum amounts, known as required minimum distributions (RMD) based on your specified age as outlined under IRS Guidelines. Once your RMD age is determined, if you continue to work past this age, you are generally not required to make RMD's from your current employer's plan.
- **Loans:** Option 1 or 2 may offer the ability to borrow your assets.
- **Protection from Creditors:** Generally speaking, assets in option 1 and 2 have unlimited protection from creditors under federal law, while assets in option 3 are protected from bankruptcy proceedings only. State laws vary in the protection in lawsuits for assets in option 3.
- **Employer Stock:** If you hold a significantly appreciated employer stock in option 1 or 2, this could have a negative tax consequence if rolling the stock into option 3. The tax advantages of retaining employer stock in option 1 or 2 should be balanced with the possibility that you may be excessively concentrated in employer stock. It can be risky if you have too much employer stock in your retirement account.

These are examples of factors that may be relevant when analyzing available options, and the list is not exhaustive. Other rollover situations (e.g. an IRA to IRA rollover) have many of the same considerations outlined above. Other considerations also might apply to your specific circumstances. Please consult with your legal or tax advisor for more information concerning your individual situation.

Our Professionals

When working with us, you may interact with various financial professionals who offer services. Our financial professionals are part of a captive sales force, which means they can only offer certain products and services. Based on the entities they are representing, they have different authorities that they are authorized to perform. Below is a description of the authorities they may act upon when working with you.

State Licensed Insurance Producers are authorized by an insurance company to offer and service insurance products.

Financial Advisors are individuals authorized by contract and in good standing with CTB to perform certain fiduciary acts on behalf of CTB, such as providing Investment Advice and Financial Planning.

Referral Agents are Insurance Agents authorized by contract and in good standing with CTB to provide certain ancillary activities, such as marketing, solicitation, and client assistance on CTB's behalf to make referrals to CTB.

Registered Representatives are registered and qualified to offer registered securities on behalf of CCMC.

To conduct our business, we engage our financial professionals to act in different capacities. The below chart describes the capacities and entities in which our financial professionals can act upon.

	CILAC	CTB	CCMC
State Licensed Insurance Producers	X		X
Financial Advisor		X	
Referral Agents		X	
Registered Representatives			X

Our financial professionals hold different positions, which may be compensated differently. Although all of our financial professionals are trained appropriately to meet your needs, understanding how they are compensated for working with you is important.

The various roles our financial professionals fill are as follows:

Those financial professionals with the title "Insurance Agent"* are State Licensed Insurance Producers and are contracted as Referral Agents of CTB. Those with the title "Financial Advisor" or "Registered Representative" are contracted as a Financial Advisor of CTB, a Registered Representative of CCMC, as well as a State Licensed Insurance Producer. This group of financial professionals are compensated off their production. Depending on the product recommended, the methods and amount of compensation these individuals receive for sales and servicing activities conducted on behalf of our affiliates will differ and could create an incentive for them to offer one product over another. These financial professionals may be referred to as "representatives."

*Not authorized to provide recommendation on fixed annuity products offered by CILAC.

Financial professionals with the title “Agency Manager” serve as field management personnel and are paid a salary for fulfilling this role on behalf of our companies. They may receive additional cash compensation based on the amount of sales production and funding of accounts/products across our companies attributable to financial professionals under their management. Such compensation is not impacted by the type of product recommended.

Compensation & Conflicts of Interest

The availability of insurance, investments products and services can vary by state, by each of the companies, and by a financial professional’s licensing and authorities. Ask a financial professional if you have any questions about product or service availability.

When making recommendations for any qualified account, securities transaction, or investment strategy involving securities, we are prohibited from putting our financial or other interests ahead of yours. We have policies and procedures in place addressing both conflicts of interest and ethical obligations, and we require all personnel to act in accordance with applicable laws, regulations, and industry rules. Failure to do so can result in disciplinary measures including termination. However, the way that we make money can create financial incentives that could cause our interests to conflict with yours.

Our financial professionals earn cash compensation, which may include commissions from premium payments and/or fees based generally on the value of the policy or account. In addition to cash compensation, COUNTRY Financial® may recognize representatives and Agency Managers through reward programs that factor in overall sales of products and services offered by the companies.

These programs are described below:

- **Production contests** – representatives can earn additional rewards based on sales production on behalf of our affiliated companies that count toward enterprise-wide programs. Generally, these reward programs incentivize new asset and premium growth with the companies, as well as new premium growth for our insurance affiliates, measured over a set period of time. Qualification for these reward programs can be met by multiple different combinations of company new asset growth and insurance new business production for our affiliates. Meeting reward thresholds can result in additional cash compensation as well as awards and recognition for representatives. This could include paid travel and accommodations for presentation ceremonies at domestic and international locations. Representatives that achieve certain levels of recognition status also receive access to additional benefits, including preferential business administrative handling by affiliates, additional marketing resources and participation on internal advisory committees. Agency Managers can also earn these rewards; however, they do not earn these rewards based on their production, but rather they are rewarded for the performance of representatives in their agency group in meeting new business and new asset goals or benchmarks.
- **Expense reimbursements** – representatives may also qualify based on sales for reimbursement of expenses incurred when participating in training programs and industry recognitions.
- **Deferred compensation plan** – If certain eligibility requirements are met, representatives’ earnings are also included in determining contributions to a deferred compensation plan sponsored by an affiliated company.
- **Production requirements** – In some situations, representatives may be subject to minimum production requirements to maintain their affiliation with the companies. These requirements are based on the sales production, funding of accounts/products, and/or servicing activities across our affiliated companies. The production requirement does not require production of a specific type of product or service. The conflicts identified in this section may influence recommendations made to you and may incentivize the recommendations made to you. Because of these conflicts representatives may have a financial interest that could impact the recommendation of our products and services.

Reward programs generally incentivize growth of new assets for the companies. Because of this, representatives may be influenced to provide recommendations of new accounts and products, including the rollover of new assets into existing accounts or products, to meet certain thresholds. Additionally, because the reward programs provide different paths to qualification based on different categories of products and services, representatives may be incentivized to recommend a certain type of product or service depending on their ability to meet certain category thresholds.

In addition to the conflicts our financial professionals have, conflicts may exist between the companies. We have a process in place to mitigate and address these conflicts.

Your financial professional may recommend products or services from any of the companies. Some of the products and services offered by the companies may be used to meet the same goals and objectives. For example, a client who is seeking long-term investment solutions may open a Journey Series account at CTB or purchase a mutual fund through CCMC. Or a client seeking guaranteed retirement income may consider a fixed annuity from CILAC or a fixed annuity sold through CCMC. While these may meet similar goals and objectives, there are key differences that should be considered before making any decision. Depending on your personal circumstances, one competing solution may result in the financial professional receiving different compensation than they would have received for the other solution, which may impact the recommendation provided.

Additionally, product availability may impact recommendations made by your financial professional. Your financial professional is a captive representative of the companies, meaning they are only able to offer products and services sold by or through the companies. Because of this, your available options may be limited. Additionally, the products or services we provide may have age or minimum premium or contribution requirements. Depending on your individual circumstances, this may impact what product or service, if any, your financial professional recommends to meet your needs. As your situation and needs change over time, other products and services may be available that were not available during prior discussions with your financial professional. It is important for you to understand the benefits, features, risks, and costs associated with any transfer, surrender, rollover, or other change to any product or service.

There are other programs that may create conflicts of interest or may affect what recommendations are given by your financial professional. One such program is the availability of a multi-line discount for certain products and services. An affiliate of the companies may offer a discount for certain home insurance products if you purchase additional products and services from the companies. However, there are certain minimum balance qualifications and restrictions that limit its availability. Additionally, products purchased through CCMC are excluded from this discount.

While the way our financial professionals are compensated may create conflicts of interest, we have policies and procedures in place to ensure that we are putting your goals and objectives at the forefront of our relationship with you. To mitigate these conflicts, our financial professionals receive comprehensive training on the products and services we provide. Additionally, we provide our financial professionals with tools and resources to help meet your financial goals and objectives. With regard to new business applications and account servicing, we also employ personnel at our home office to review recommendations made to ensure they are appropriate to meet your needs. The home office review teams are salaried and their compensation is not directly impacted by the sale of any product or service. In addition to this new business review process, we conduct regular compliance reviews to ensure that our financial professionals are meeting their required obligations.

This document serves as the general handbook discussing information applicable to each of the companies. Financial professionals may have additional conflicts of interest not disclosed herein, which they will disclose to you orally. For information specific to each entity's products and/or services, please refer to each of the handbooks enclosed.

Not FDIC Insured

- No Bank Guarantee
- May Lose Value

Investment management, retirement, trust and planning services provided by COUNTRY Trust Bank®.

Registered broker/dealer offering securities products: COUNTRY® Capital Management Company, 1711 General Electric Rd, PO Box 2222, Bloomington, IL 61702-2222, 1-866-551-0060. Member FINRA.

Fixed annuities may be issued by COUNTRY Investors Life Assurance Company®, Bloomington, or issued by unaffiliated insurance companies and offered by COUNTRY® Capital Management Company a state licensed insurance agency.