The Retirement Corporation of America (RCA) is registered with the Securities and Exchange Commission as an investment adviser and a wholly-owned subsidiary of Fifth Third Bank, National Association. Brokerage and investment advisory services and fees differ. It is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker dealers, investment advisers, and investing.

ITEM 2: RELATIONSHIPS AND SERVICES

—WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer advisory and retirement planning services, managing a variety of asset allocation strategies utilizing primarily mutual funds and exchange traded funds (ETFs). We will work with you to develop an investment strategy to achieve your investment goals. Other firms could provide managed strategies utilizing a wider range of investment choices, some of which might have lower costs. You will have the opportunity to place reasonable restrictions with respect to the investments in your portfolio. The cash and securities comprising your portfolio will be held by a qualified custodian designated by you. As part of our standard services, we will have full discretionary authority to regularly and continually monitor and buy and sell investments in your account without asking you in advance. We also offer limited advisory services for non-discretionary assets, whereby you make the ultimate decision regarding the purchase or sale of the assets in your account, as well as various insurance solutions.

For additional information, please see our Form ADV, Part 2A brochure, Items 4 and 7.

Ask your financial professional—
• Given my financial situation, should I choose an investment advisory service? Why or why not?
• How will you choose investments to recommend to me?
• What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

ITEM 3: FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT

—WHAT FEES WILL I PAY?

The fee for advisory services is an asset-based fee billed in arrears based on the value of cash and investments in your advisory account at the end of each month or quarter. The fee schedule will be a tiered fee structure. Tiered means the fee is calculated by applying different rates to different portions of your total assets. When the account assets reach a new threshold, only those assets above the threshold are charged the successively lower percentages. There is a minimum annual fee, although we reserve the right to waive the minimum. The client agreement shall specify if the minimum fee applies. Non-discretionary accounts are billed at a flat rate fee based on the value of cash and investments in your account.

RCA requires you to provide consent for RCA to directly debit the investment management fees from your custodian account. The more assets there are in your advisory account, the more you will pay in fees. We may, therefore, have an incentive to encourage you to increase the assets in your account. In addition to the asset-based fee paid to us, you may also pay custodian fees, transactional fees and various fees related to mutual funds and ETFs purchased for your account.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.
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**Ask your financial professional—**

- Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

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**WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?**

_When we act as your investment adviser_, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations we provide you. Here are some examples to help you understand what this means:

- The firm advises accounts for various types of clients. We seek to ensure that all clients are treated fairly and equitably over time regardless of the type of client, level of services provided, or the nature of its fee compensation.
- The level of fee will depend on the type of account and the investments held in your account. As a result, you could pay RCA a higher or lower fee depending on the investment strategy selected for your assets and/or the restrictions you place on your account.

For additional information, please see our Form ADV, Part 2A brochure, Item 6.

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**Ask your financial professional—**

- How might your conflicts of interest affect me, and how will you address them?

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**HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

The firm’s investment professionals receive a salary and incentive compensation based on revenue. Relationship managers receive a salary and incentive compensation based on revenue from two components: assets under management and sales of insurance solutions. These investment professionals and relationship managers are also eligible to receive varying amounts of restricted Fifth Third Bank stock under Fifth Third Bancorp’s long-term incentive plan.

Compensation based on revenue may incent the employee to encourage clients to choose higher risk strategies. Ultimately, the strategy you choose is determined based on the results of your risk-profile analysis.

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**ITEM 4: DISCIPLINARY HISTORY**

_—DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?_

No. However, our parent company and affiliates have such history. Please see our Form ADV, Part 1, Item 11.

Free and simple tools are available to research our firm and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS).

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**Ask your financial professional—**

- As a financial professional, do you have any disciplinary history? For what type of conduct?

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**ITEM 5: ADDITIONAL INFORMATION**

*For additional information*, please see our Form ADV, Part 2A brochure, available at [https://adviserinfo.sec.gov/firm/summary/105994](https://adviserinfo.sec.gov/firm/summary/105994). Additionally, our current Form ADV, Part 2A brochure and this relationship summary are available by contacting Retirement Corporation Compliance at 513.769.4040.

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**Ask your financial professional—**

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?