



## **FIDUCIARY DISCLOSURE**

When we provide investment advice to you regarding your retirement plan account or individual retirement account (IRA), we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act (ERISA) and/or the Internal Revenue Code (Code), as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with 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 provision, 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 regarding conflicts of interest.

When we provide investment advice, we are subject to various legal requirements that are overseen by different regulators. We are required to acknowledge fiduciary status under ERISA and the Code for advice we provide to your retirement plan account or IRA. This acknowledgement 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.

## **CONFLICTS OF INTEREST**

When our firm and our financial professionals recommend you roll your assets over, we and our financial professionals will earn commissions and/or fees if you accept the recommendation. This compensation serves as an incentive for us and our financial professionals to recommend our products and services. Your financial professional is available to discuss any additional conflicts of interest they may have.