

Regulation Best Interest (Reg BI)

Potential Conflicts of Interest

Retirement Account Rollovers

Potential Conflict of Interest

Many clients have a retirement plan offered through their employer. In many cases, when you retire or change jobs, you may have a decision to make on what to do with your retirement account assets. For many plans, you are required to roll the plan assets to an IRA, a new employer-sponsored plan, another investment, or take the assets as a taxable distribution; while other plans allow you to keep assets in the plan indefinitely, or for a period of time.

Different kinds of accounts have different features, services, investment choices, fees, and charges. Different investment choices may also offer different types or levels of compensation to us or our representatives. In recommending what to do with your retirement plan assets, we may potentially have the incentive to offer one kind of account or investment product over another.

How We Eliminate or Mitigate Conflicts of Interest

We prohibit sales contests around rollovers that might provide representatives incentive to choose one account type over another. During our discussions with you on whether to rollover your retirement assets, and if so, what type of account and product to choose, we use a Retirement Assets Rollover Documentation form to discuss the various options for your retirement assets. We discuss and document, at minimum:

- Your potential rollover or transfer amount.
- Your overall investable assets, and what proportion these retirement account assets comprise your overall assets.
- Your overall investment profile, including your investment objectives, time frame, and level of investment experience, sophistication, and risk tolerance.
- Your desire for investment management or a self-directed option.
- Your current plan expenses (if any), compared to the fees and expenses of rollover options.
- Whether your current plan allows you to keep the account, and for how long.
- Unique features of the employer plan, such as availability of plan loans.
- Range of investment choice offered.
- Different RMD rules for the various choices.
- Any other relevant factors, including your personal preferences.

We believe this form and discussion will provide us with the ability to help you make the rollover choice and investment products that are in your best interest.