

IRA Rollover / Transfer Disclosure and Questionnaire

Client's Name	Date of Discussion	Rep. Name	Rep. #
Existing Account Custodian	Proposed Account Custodian	\$	Approx. Transaction Amount

For the purposes of complying with the Department of Labor (“DOL”) Prohibited Transaction exemption 2020-02 (“PTE 2020-02”) where applicable, we are providing the following acknowledgement to you.

When we provide investment advice to you regarding your 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. 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 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;**
- **Follow policies and procedures designed to help us provide 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.**

I. Description of the Rollover/Transfer/Conversion/Other Asset Movement:

- IRA to IRA Transfer
- Roth IRA to Roth IRA Transfer
- IRA to Roth IRA Conversion
- Retirement Plan to IRA Rollover
- Other: _____

II. Best Interest Analysis

1. What are the Client’s Specific Reasons for the Asset Movement? Check all that apply:

- Dissatisfied with investment options
- Dissatisfied with performance
- Lack of income guarantees
- Desire to consolidate assets
- Desire for more control over assets
- Desire for professional advice or management
- Desire for access to additional services
- Other: _____

2. How are the retirement assets currently invested? Check all that apply:

- Mutual Funds
- ETFs
- Stocks and/or Bonds
- Variable Annuities
- Other: _____

3. Summarize the representative's recommendation and address the services that will be provided when considering a recommendation.

a. Alternatives to the rollover/transfer include:

- Leaving the funds in the existing employer's plan or existing IRA
- Rolling over the funds to a new employer's retirement savings plan
- Cashing out and taking a taxable distribution from the plan or existing IRA
- Rolling over the funds in the plan to an IRA
- Other (if applicable): _____

b. Compare approximate annual total fees and expenses of the existing account to the proposed IRA rollover account. Include internal operating expenses, management fees, annual custodial fees, etc.

	<u>Existing Account</u>	<u>Proposed Account</u>
Approx. Annual Total (\$ or %)	_____	_____

Does the employer pay for some or all of the plan's administrative expenses? Yes No N/A

Are there any tax or penalty considerations for the transaction? Yes* No

*If Yes, describe: _____

c. Compare the different levels of service and investments available in the current account and the proposed account (check all that apply).

	<u>Existing Account</u>	<u>Proposed Account</u>
<u>Products Available:</u>		
Mutual Funds	—	—
ETFs	—	—
Stocks/Bonds	—	—
Variable Annuities	—	—
Other (describe) _____	—	—
<u>Services Available:</u>		
Investment Advice	—	—
Full Service	—	—
Personal Service	—	—
Other (describe) _____	—	—

Additional Considerations (optional): _____

Basis for the Representative's Recommendations

The representative has considered alternatives to the rollover/transfer and has discussed these with the client. The client has decided to go forward with the representative's recommendation. The client understands the differences in products, services, features and expenses between the existing account and the recommended account. The client understands what products and services are being provided in return for the fees being paid.

Additional information (optional): _____

Reasons Why the Recommendation is in the Best Interest of the Client

The client will receive professional and personal investment recommendations and advice as applicable. The client will be working with a representative who may provide holistic advice in connection with the client’s overall financial goals.

Additional information (optional): _____

III. Reasonable Compensation Analysis

Financial professionals are permitted to receive reasonable compensation for their services. Compensation includes both direct and indirect compensation. “Reasonable” means the compensation cannot be excessive, but it does not mandate that the compensation provided be the lowest possible.

Compensation must be judged in the context of the services provided. As a result, higher compensation may be reasonable for more comprehensive and detailed services.

Whether or not compensation is reasonable depends on how it compares to alternatives and other benchmarks in the industry.

The compensation the financial professional is receiving for the services provided is reasonable because commissions, fees, and/or trails being charged are consistent with that charged by other firms in the industry.

Additional information (optional): _____

IV. Attestation

This IRA Rollover/Transfer Disclosure and Questionnaire is intended to supplement other required disclosures such as Form CRS and other disclosures as applicable. By signing below, the representative affirms they promptly will or have provided the client with a copy of this completed form and other required disclosures. The representative further affirms they have read, understand, and are following the firm’s policies and procedures regarding this DOL rule.

Representative’s Signature

Date

By signing below, the client affirms receipt and agreement with this completed IRA Rollover/Transfer Disclosure and Questionnaire.

Client’s Signature

Date

Additional Representative Notes (optional): _____

