



## RETIREMENT ACCOUNT DISCLOSURE

The Leaders Group, Inc. (TLG) acknowledges that we act as fiduciaries with respect to recommendations we provide in connection with one or more of the following:

- Selection of investment account arrangements (e.g., brokerage versus advisory);
- Rollovers, transfers or distributions to or from an IRA, including whether to effectuate a rollover, transfer or distribution, the amount or the form of the rollover, transfer or distribution, the provider to receive the rollover, transfer or distribution, or the investment of assets that are rolled over or otherwise transferred or distributed to IRAs;
- Selection of investment advisers and other persons providing investment management services;
- Acquiring, holding, disposing of, or exchanging, securities or other investment property;
- How securities or other investment property should be invested after the securities or other investment property are rolled over, transferred, or distributed from the IRAs; or
- Management of investments, including policies or strategies, portfolio composition.

This fiduciary acknowledgement relates only to your IRA Account and applies only to the recommendations regarding the activities described above that we provide to you. Furthermore, we do not undertake as part of this fiduciary acknowledgement to provide any legal, tax or accounting advice in connection with your IRA Account. It is your responsibility to obtain legal, tax and accounting guidance from independent professional sources prior to making any investment decision.

In providing recommendations that are within the scope of this disclosure, we will act at the time a recommendation is made with: the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a fiduciary capacity and familiar with such matters would use in the making a recommendation and with like aims, based on your investment objectives, risk tolerance, financial circumstances, and needs, without regard to the financial or other interests of TLG, the financial adviser, or any affiliate, related entity, or other party. Recommended transactions will not cause us, our affiliates or related entities to receive directly or indirectly compensation for our services that is in excess of reasonable compensation within the meaning of Section 408(b)(2) of the Employee Retirement Income Security Act of 1974, as amended, or Section 4975(d)(2) of the Code.

Our statements to you about any recommended transaction, fees and compensation, material conflicts of interest, or any other relevant matters will not be materially misleading at the time they are made.

We represent and warrant that:

- We have adopted and will comply with written policies and procedures reasonably designed to ensure that our financial advisers adhere to the standards set forth in this disclosure.
- In formulating our written policies and procedures, we have specifically identified and documented material conflicts of interest; adopted measures reasonably and prudently designed to prevent material conflicts of interest from causing violations of the impartial conduct standard; and designated a committee responsible for addressing material conflicts of interest and monitoring the financial advisers' adherence to the standards.
- Our policies and procedures require that neither TLG (nor to the best of our knowledge any of our Affiliates or Related Entities) use or rely upon quotas, appraisals, performance or personnel actions, bonuses, contests, special awards, differential compensation or other actions or incentives that are intended or would reasonably be expected to cause our financial adviser to make recommendations that are not in your best interest.
- Notwithstanding the above, we may provide affiliates, related entities, and financial advisers with compensation that may differ based on your investment decisions and neutral factors tied to the differences in the services delivered to you, to the extent that our policies and procedures and incentive practices, when viewed as a whole, are reasonably and prudently designed to avoid a conflict of the interests of the financial advisers with your interests.