



## The DOL Fiduciary Rule: Impartial Conduct Standards

Under the DOL's expanded definition of "investment advice fiduciary" (Fiduciary Rule), Vanderbilt Advisory Services, LLC is required to comply with the "impartial conduct standards" which are consumer protection standards that ensure adherence to fiduciary norms and basic standards of fair dealing. The following statements provide disclosure of Vanderbilt Advisory Services, LLC's compliance with the Fiduciary Rule:

- Give advice that is in the "best interest" of the retirement investor. This best interest standard has two chief components: prudence and loyalty:
  - Under the prudence standard, the advice must meet a professional standard of care as specified in the text of the exemption;
    - Vanderbilt Advisory Services, LLC meets this standard through policies, procedures and controls it has designed and implemented to ensure that its associated personal attain and maintain all required licensure, registration and other credentials as may be necessary to manage client accounts.
    - Vanderbilt Advisory Services, LLC's policies, procedures and controls are designed to ensure compliance with all prevailing regulations
    - Information about Vanderbilt Advisory Services, LLC or any of its associated persons is available on request, or may be obtained from public websites hosted by the regulators including:
      - [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)
      - [www.finra.org/brokercheck](http://www.finra.org/brokercheck)
  - Under the loyalty standard, the advice must be based on the interests of the customer, rather than the competing financial interest of the adviser or firm;
    - Vanderbilt Advisory Services, LLC has established a fee-based compensation schedule that is agnostic to the security selection, but rather is based on assets under management.
    - Vanderbilt Advisory Services, LLC does not earn variable compensation, commissions or other fees related to the management of client accounts.
- Charge no more than reasonable compensation;
  - Vanderbilt Advisory Services, LLC's fee schedule is published in its Disclosure Brochure, and available on request or at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (Brochures).
  - Vanderbilt Advisory Services, LLC's fees will be up to and including 2.75% of assets under management.
  - Although clients may incur variable rates for trade execution including brokerage commissions, account maintenance fees, execution fees, postage, mailing and other costs, Vanderbilt Advisory Services, LLC:
    - Does not earn any portion of these fees
    - Takes steps to ensure best execution and the value of account services overall
    - Conduct periodic reviews to ensure that costs paid by clients are within a reasonable range of other services available through other providers.
- Make no misleading statements about investment transactions, compensation, and conflicts of interest.
  - Vanderbilt Advisory Services, LLC has designated a Compliance Officer, whose responsibilities include oversight of communications including the duty of ensuring that:
    - all statements are balance and fair,



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- communications are made in plain English and readily understandable,
- clients are invited at any time to contact Vanderbilt Advisory Services, LLC for additional clarifying information, and
- conflicts of interest are disclosed on each associated person's Form ADV Part 2B and/or on the materials themselves, if/when applicable