



# Retirement Account Disclosure

---

When Sanctuary Securities, Inc., Sanctuary Advisors, LLC. as well as its network of investment advisor representatives (collectively, "Sanctuary") provide "investment advice" as defined under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and/or section 4975 of the Internal Revenue Code of 1986 (the "Code") (collectively, the "Retirement Laws") regarding a Retirement Account,\* Sanctuary is a "fiduciary" under the Retirement Laws. This acknowledgment of status under the Retirement Laws is not intended to create or expand any "fiduciary" relationship, capacity or obligations of Sanctuary under other federal, state or local laws.

Sanctuary provides "investment advice" as defined under the Retirement Laws when Sanctuary:

- renders advice (a) as to the value of securities or other property, or makes recommendations as to the advisability of investing in, purchasing, or selling securities or other property, (b) on a regular basis, (c) pursuant to a mutual agreement, arrangement, or understanding with the Retirement Account owner, (d) the advice will serve as a primary basis for investment decisions with respect to the Retirement Account assets, and that (e) the advice will be individualized based on the particular needs of the Retirement Account; and
- receives a fee or other compensation (direct or indirect) for such advice.

When Sanctuary acts as a "Fiduciary" under the Retirement Laws

When Sanctuary provides a recommendation to you concerning a rollover or transfer of your retirement assets to a Sanctuary Retirement Account or the selection of an investment account type (e.g., brokerage or advisory account arrangement) for your Sanctuary Retirement Account, Sanctuary acts as a "fiduciary" under the Retirement Laws with respect to that recommendation.

When Sanctuary provides portfolio allocation advice for 2019-2021 401(k) retirement plans held away from Sanctuary, Sanctuary acts as a "fiduciary" with respect to that advice. For more information on Sanctuary's role with respect to held away 2019-2021 401(k) retirement plans, please see sections 4.C., 5.B., and 8.B. of Sanctuary's ADV Part 2A disclosure document.

When you engage with Sanctuary in an investment advisory account relationship for your Retirement Account, Sanctuary acts as a "fiduciary" under the Retirement Laws with respect to the investment advisory services Sanctuary provides to your Retirement Account. Sanctuary acts as your investment adviser only when Sanctuary has entered into a written advisory agreement with you that describes the advisory relationship and Sanctuary's obligations to you. Please refer to Sanctuary's ADV at <https://docs.sanctuarywealth.com/adv> and your advisory agreement for more information about the services offered under the program, the advisory fees, potential conflicts between Sanctuary's interests and yours, and Sanctuary's role and responsibilities to you.

## Retirement Account Disclosure

---

When Sanctuary does not act as a “Fiduciary” under the Retirement Laws

Note, however, that there are many communications and recommendations that are not considered “investment advice” under these Retirement Laws (which are subject to change), including (but not limited to):

- P Recommendations with respect to nonretirement brokerage accounts you maintain with us.
- P Communications that are educational or informational and not intended to be viewed or construed as an