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February 2014

**FORM ADV PART 2A  
BROCHURE**

This brochure provides information about the qualifications and business practices of Symmetry Partners, LLC. If you have any questions about the contents of this brochure, please contact us at 800-786-3309 or visit our website [www.symmetrypartners.com](http://www.symmetrypartners.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Symmetry Partners, LLC, is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Symmetry Partners, LLC, is SEC File Number 801-61342.

Symmetry Partners LLC, is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

### ***SUMMARY OF MATERIAL CHANGES***

**This item will discuss only specific material changes to Symmetry Partners' Brochure that have occurred since the last annual update of 03/2013.**

**Not applicable.**

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## **Advisory Business**

Form ADV Part 2A, Item 4

### **A. Description of Advisory Firm**

Symmetry® Partners, LLC (“Symmetry”) is an investment adviser registered with the Securities and Exchange Commission (“SEC”). The firm is located in Glastonbury, Connecticut and was established in 1994. The firm was founded by and is currently owned and operated under the control of David E. Connelly Jr., and Patrick A. Sweeny.

### **B. Types of Advisory Services**

Symmetry currently creates portfolios primarily utilizing open-end mutual funds created and managed by Dimensional Fund Advisors, (“DFA”) and Vanguard. These portfolios are called Symmetry Structured and Symmetry Bond Portfolios. In addition, as part of the Symmetry Retirement program, Symmetry has created a target date version of the Structured Portfolios called the Evolution Portfolios. Symmetry also creates portfolios utilizing exchange traded funds, (“ETFs”), labeled the GlobalCore® ETF Portfolios. These portfolios are currently comprised of exchange traded funds issued by Vanguard, iShares and SPDR. Symmetry portfolios typically consist of three to fifteen mutual funds or exchange traded funds, and a small allocation to money market funds. Symmetry may also customize portfolios to fit the unique needs and situations for clients. Symmetry selects the funds which comprise the portfolios that the firm believes are most suitable and consistent with the investment philosophy of the firm. Symmetry is not obligated to use any specific security in the creation of the portfolios as Symmetry is not affiliated with the sponsor or adviser of any fund or security. Symmetry does not exclusively recommend portfolios. As part of the Symmetry Retirement program, Symmetry will recommend a menu of individual mutual funds, known as IndexElect, to plan sponsors who wish to have a selection of individual funds for the plan’s participants. Through the Symmetry Retirement program, Symmetry manages assets for qualified plans such as, but not limited to, 401(k), money purchase, profit sharing, defined benefit plans and institutional pension plans. Symmetry also provides services to the Advisor’s Edge Select variable annuity backed by Monumental Life.

Symmetry offers these portfolios, programs and investment advisory services to clients who are referred to Symmetry’s services through investment adviser and registered representatives of unaffiliated independent Broker-Dealers and Registered Investment Advisers. In addition, Symmetry provides these services to clients obtained directly through its own investment adviser representatives. Clients obtained through the firm’s investment adviser representatives’ efforts may obtain financial planning as part of the services provided by Symmetry.

Symmetry provides impersonal advisory services acting as a sub-adviser to various broker-dealers and registered investment advisors (“RIA”) programs.

#### *Symmetry Structured Portfolios*

The Symmetry Structured Portfolios are a suite of asset allocation portfolios comprised exclusively of open-end mutual funds advised by Dimensional Fund Advisors, tax-managed, and non-tax-managed. The Symmetry Structured Portfolios are comprised of an equity and fixed income allocation and vary only in their allocation between the equity and fixed income.

The equity portion of each Symmetry Structured Portfolio provides exposure across global equity asset classes to provide a high level of diversification, including an allocation to the United States, international developed markets and emerging markets. Symmetry directs the target allocation to each of these geographic areas as well as the underlying asset classes within each region. Generally, the portfolios feature overweights to US, value, small and REIT stocks. The value and small overweights are based on academic research that suggests that these asset classes outperform growth and large-cap counterparts, respectively, over time. Symmetry updates the allocations from time to time based on strategic long-term considerations. Clients are rebalanced periodically to maintain their desired equity to fixed income allocation and put all positions back to or near the current target for their portfolio.

The goal of each portfolio's fixed income position is to mitigate the risk taken in the equity positions. Therefore, the bond positions take relatively little duration or credit risk relative to a mainstream fixed income benchmark such as the Barclays Aggregate Bond Index, as their function is mainly to provide a buffer against equity market downturns (or to offer a very low-risk alternative for clients who invest in the 0/100 models).

The Symmetry Structured Portfolios are designed overall to be passive, broadly diversified, and low-cost and tax efficient.

#### *Symmetry GlobalCore® ETF Portfolios*

The Symmetry GlobalCore ETF Portfolios are a suite of asset allocation model portfolios currently comprised exclusively of ETFs in the Vanguard, iShares and SPDR ETF families. The GlobalCore ETF portfolios, tax-managed, and non-tax-managed, are comprised of an equity and fixed income allocation and vary only in their allocation between the equity and fixed income.

The equity portion of each GlobalCore ETF Portfolio provides exposure across global equity asset classes to provide a high level of diversification. The GlobalCore model portfolios are designed specifically to remain in line with the global market weights to the United States, international developed markets and emerging markets, while employing slight tilts toward small cap and value stocks in each of these arenas. Symmetry periodically updates the model allocation to keep it in line with the current relative capitalization of US, international developed and emerging markets. Clients are rebalanced periodically to maintain their desired equity to fixed income allocation and put all positions back to or near the current target for their model portfolio. The fixed income portions of the model portfolios are comprised of short-term, high-quality bond ETFs. The philosophy behind the fixed income position is to mitigate the risk taken in the equity positions. The bond positions therefore take little duration or credit risk relative to a mainstream fixed income benchmark such as the Barclays Aggregate Bond Index, as their function is mainly to provide a buffer against market downturns that will be felt on the equity side (or to offer a very low-risk alternative for clients who invest in the 0/100 models). The GlobalCore ETF Portfolios are designed overall to be passive, broadly diversified, low-cost, tax efficient core models that can be used in conjunction with outside assets or as standalone portfolios.

#### *Symmetry Bond*

The Symmetry Bond Portfolios are two standalone fixed income asset allocation portfolios, one tax-managed, one non-tax-managed. The Portfolios are currently comprised of open-end mutual funds from Dimensional Fund Advisors and Vanguard. The portfolio is designed as a standalone fixed income product that takes some fixed income risks. The tax-managed version of the portfolio features an allocation to national, short-term, high-quality municipal bonds in addition to other holdings. The non-tax-managed version holds a short-term bond fund in addition to other holdings.

### *Custom Model Strategy*

The solicitor's investment adviser or registered representatives may also suggest a Custom Model Strategy portfolio to the clients. A custom allocation combines various Symmetry portfolios, to create a new portfolio. Any of the above mentioned Symmetry Structured portfolios, GlobalCore ETF portfolios, and Symmetry Bond can be combined. The combining of the portfolios will create a new asset allocation but all the funds that were in the underlying portfolios used to create the new portfolio will remain. There are no funds added or removed from the target allocation in the custom portfolio. Please note the Symmetry Evolution Portfolios cannot be used in the Custom Model Strategy program. May not be available at all custodians.

### *Symmetry Evolution Portfolio*

Offered only within the Symmetry Retirement program, the Evolution Portfolios are target date versions of the Structured Portfolios that feature an automatic rebalance of the equity to fixed allocation in the client's account. Starting out as a 100/0 non-tax-managed Structured Portfolio, the Evolution Models will ratchet down the equity allocation in five-year increments until reaching the final stage, at which the model features a 30/70 equity to fixed income mix. The Portfolios are designed to accommodate clients as they age, and/or get closer to withdrawing their assets and therefore wish to gradually reduce their equity risk exposure over time.

### *IndexElect*

IndexElect is a list of asset class funds recommended by Symmetry Partners as suitable complements to Symmetry Structured Portfolios. The list of funds has been compiled to provide plan sponsors of qualified plans with access to broad asset classes; in some cases, they represent asset classes that are either not available or are underweighted within the Symmetry Structured Portfolios.

### *Investment Advisory Services*

Symmetry provides investment advisory services to clients who are referred to Symmetry through investment adviser and registered representatives of unaffiliated independent Broker-Dealers and Registered Investment Advisers known as ("Solicitors"). A prospective client that becomes a client of Symmetry Partners as a direct result of the solicitor is identified as, "*Solicited Client.*"

Investment advisory services for the solicited client require the solicitor, through its representatives, to introduce and assist the client in establishing a relationship with Symmetry Partners. The services include periodic contacts, being available to answer client inquiries, updating client information, meeting at least annually to determine if there is a change in the client's financial situation, and assisting the prospective client in understanding the services provided by Symmetry. Symmetry's inside and outside wholesalers assists the solicitor's representative with these services. The prospective client suitability to determine the appropriate Symmetry Portfolio for the client's unique circumstances is established through various documents that may include, but are not limited to, the solicitor's investment adviser representative's communication, correspondence, various suitability documentation, the distribution of a Symmetry provided questionnaire, Symmetry's Investment Policy Statement or Statement of Investment Selection. All forms of suitability are to determine the client's investment objectives, time horizon, tax considerations, income needs, but most importantly for Symmetry's investment philosophy, the risk tolerance.

The firm offers investment advisory services to clients that have come to the firm through the efforts of the firm's investment adviser representatives ("IARs"), labeled "*Direct Clients.*" The firm's IARs

assist Symmetry's clients in determining which of the model portfolios established by Symmetry is most appropriate for each client. Symmetry services may include the following: reviewing the client's investment portfolio at the commencement of its relationship with Symmetry; assessing the client's investment needs and objectives; investment policy planning and suitability; developing an asset allocation strategy designed to meet client objectives; ongoing monitoring of the performance of the accounts; reviewing accounts to ensure adherence to policy guidelines and rebalancing asset allocations when Symmetry, in its discretion, deems such re-balancing appropriate for the client; answering client inquiries; updating client information; and interviewing the client at least annually to determine if there has been a change in the client's financial situation. Symmetry permits clients to maintain certain securities in their advisory account(s) that are not recommended by Symmetry. For these securities, IARs of Symmetry will provide consultation services, which consist of general guidance on how those assets fit into the client's overall financial objectives.

### *Financial Planning*

Symmetry also provides advice in the form of a Financial Plan. *This service is not a standalone service for a separate fee, but part of the established bundle of services and agreed upon fee charged to each client.* The direct client may receive a written financial plan, providing the client with a detailed financial plan designed to achieve the stated financial goals and objectives. Implementation of financial plan recommendations is entirely at the client's discretion.

In general, the financial plan will address any or all of the following areas of concern:

PERSONAL: Family records, budgeting, personal liability, estate and financial goals.

TAX & CASH FLOW: Income tax and spending analysis and planning for past, current and future years.

RETIREMENT: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.

INVESTMENTS: Analysis of investment alternatives and their effect on the portfolio.

### *Symmetry Retirement Program*

Symmetry is an Investment Manager as defined in Section 402(c)(3) and 3(38) of the Employment Retirement Security Act.

Symmetry works with a select group of third party administrators ("TPA"), referred to as Symmetry's QP Partners. Symmetry offers its investment management services to 401(k) and qualified plans through the Symmetry Retirement program.

Symmetry will review investment options, recommend a portfolio structure, recommend appropriate changes in portfolio holdings and advise the Plan Sponsor in support of the Plan Sponsor's fiduciary role under the Plan. Symmetry will also provide the following:

Quarterly Portfolio review and performance analysis;

Review of asset allocation rebalancing;

Periodic discussion of changes in weightings of the asset allocations.

Symmetry also makes available the Symmetry IndexElect Funds. The IndexElect Funds are a menu of index mutual funds that are available for a Plan Sponsor to include in addition to Symmetry's Structured Portfolios. Symmetry's oversight responsibility extends to the IndexElect Fund menu and Symmetry's portfolios.

Symmetry also provides services to plans which fall outside the scope of the Symmetry Retirement Program. Symmetry provides investment advisory services for accounts called Outside Qualified Plans. These are individual participant accounts where the plan document allows for participants to be able to select an investment adviser or investments outside of those selected by the plan.

In addition, Symmetry provides investment management services to defined benefit plans. For these plans, Symmetry is an investment manager as defined in 402(c)(3) and 3(38) of the Employment Retirement Security Act.

#### *The Institutional Pension Plans*

The firm offers investment management services to municipalities and corporate pension plans. These services are as follows: Investment policy design and review, standard and customized performance reporting, meeting presentations, asset allocation, analysis and design, and investment oversight, monitoring and evaluation, on a regular and continuous basis.

#### *Annuity*

Symmetry provides asset allocation and administrative services to the Advisor's Edge Select Variable Annuity backed by Monumental Life Insurance Company. Please note as of 04/31/2012 Monumental Life is no longer accepting new policy holders for this annuity.

Symmetry provides asset allocation services, which includes allocation and reallocation of assets pursuant to the Symmetry investment strategy for the annuity subaccounts. In addition, Symmetry provides administrative services to registered representatives for the insurer. The services include ongoing service, support, training and education.

#### *Impersonal Advisory Services*

Symmetry provides investment advisory services acting as a sub-adviser to various RIA and broker-dealer programs.

The services Symmetry provides are as follows: portfolio design, asset allocation, and securities selection for investment portfolios to be used in advisor accounts. Based on investment analysis, Symmetry will monitor and recommend changes to portfolio models. Symmetry also provides wholesaling, marketing, and sales support to investment adviser and registered representatives who have access to these respective programs.

### **C. Individual Tailored Services and Reasonable Restrictions**

All clients may place reasonable restrictions on their accounts. Symmetry will, in some cases, also customize portfolios to fit the unique needs and situations for clients. However, a restriction request may not be honored if it is fundamentally inconsistent with Symmetry's investment philosophy, is counter to the client's stated investment objectives, or would prevent the firm from properly servicing client accounts.



**D. Wrap Fee Programs**

Symmetry is not a sponsor of or a portfolio manager to a wrap fee program.

**E. Assets Under Management**

Symmetry's current assets under management total for discretionary accounts is \$3,840,000,000 as of 12/31/2013.

## ***Fees and Compensation***

Form ADV Part 2A, Item 5

### **A. Fees**

#### *The Solicited Client*

The client is charged Symmetry's fee. A portion of Symmetry's fee, or an additional fee,\* is deducted from the client account and paid to the Solicitor. The client is also charged a custodian fee and may incur transaction costs such as, but not limited to, wire fees, commissions and termination fees. In addition, the client also pays fees and expenses related to client's investments in the mutual funds and the exchange traded funds. A description of the fees and expenses can be found in each fund's prospectus.

Symmetry will charge an annual fee based on the client's assets under management. Symmetry's standard fee schedule, (which may, in certain circumstances be negotiable), is as follows:

<u>Range Start</u>	<u>Range End</u>	<u>Percentage</u>
\$0	\$1,000,000	0.50%
\$1,000,001	\$3,000,000	0.45%
\$3,000,001	\$5,000,000	0.40%

Amounts in excess of \$5,000,001 will be priced at 0.40% and subject to the tiered schedule above unless negotiated between parties. Symmetry reserves the right to change its fee schedule at its discretion by written notification to the client.

\*The solicitor will receive an additional fee which is disclosed to the client in the solicitor's disclosure statement. The solicitor's disclosure statement is part of Symmetry's investment advisory agreement.

The aforementioned fee schedule applies to Outside Qualified Plans which do not come under the rubric of the Symmetry Retirement Program, as previously described on page 5 of this brochure.

#### *The Direct Client*

The client is charged Symmetry's fee. A portion of Symmetry's fee, or an additional fee, is deducted from the client account and paid to the firm's investment adviser representative servicing the account. The client is also charged a custodian fee and may incur transaction costs such as, but not limited to, wire fees, commissions and termination fees. In addition, the client also pays fees and expenses related to the client's investments in the mutual funds and exchange traded funds. A description of these fees and expenses can be found in each fund's prospectus.

Symmetry will charge an annual fee based on the client's assets under management. Symmetry's standard fee schedule, (which may, in certain circumstances be negotiable), is as follows:

<u>Range Start</u>	<u>Range End</u>	<u>Percentage</u>
\$0	\$2,500,000	1.00%
\$2,500,001	\$5,000,000	0.75%
\$5,000,001	over	0.50%

\*The clients serviced by the Birmingham, AL office have the following schedule:

<u>Range Start</u>	<u>Range End</u>	<u>Percentage</u>
\$0	\$1,000,000	0.50%
\$1,000,001	\$3,000,000	0.45%
\$3,000,001	\$5,000,000	0.40%

Amounts in excess of \$5,000,001 will be priced at 0.40% and subject to the tiered schedule above unless negotiated between parties. Symmetry reserves the right to change its fee schedule at its discretion by written notification to the client.

This fee is net of the investment adviser representative's fee maintaining that office. There will be an additional fee incurred by the client that is disclosed on Symmetry's investment advisory agreement.

#### *Symmetry Retirement Program*

The progressive fee schedule is 35 basis points on the first \$1,000,000.00 in assets under management, 32 basis points on the next \$2,000,000.00 in assets under management and 30 basis points on assets in excess of \$3,000,000.00 in assets under management. Symmetry has the ability to charge a flat fee or alter this schedule on a case-by-case basis.

The aforementioned fee schedule represents Symmetry's fees based on the selected TPA and custodian taking on a greater role in regards to operations and trading and applies only to qualified plans established under the Symmetry Retirement program. TPA fees will also apply and are negotiated between the plan sponsor and the TPA.

#### *Annuity*

Daily Mortality and Expense Risk Fee and Administrative Charges equal 1.45% annually. Symmetry's fee is encompassed within that fee and is .10% of the total assets of the variable annuity subaccounts for which Symmetry is providing services.

#### *Institutional*

Institutional accounts are priced on a case by case basis.

### **B. Fees Calculation and Process**

Fees are generally billed quarterly in arrears, based on the quarter-end values of a client's account on the last trading day of the quarter. The first quarter's fee will be based on the client's initial assets under management and pro-rated from the date the assets are traded in the account. Should an account be terminated the fee will be calculated based on the ending value of the previous day market value. Per the advisory contract, the client directs the firm to direct the custodian to deduct fees from the account.

Symmetry's, and if applicable, Solicitor's or Investment Adviser Representative's compensation for services shall be calculated as follows:

Market Value on last trading day of Quarter x Annual Fee Percentage for Symmetry and, if applicable, Solicitor or Investment Adviser Representative = Annual Fee Amount.

Annual Fee Amount / 4 = Quarterly Fee Amount.

The Market Value of the accounts is determined by the custodians on the appropriate day at quarter end.

#### *For Symmetry Retirement Accounts*

Symmetry works with a select group of third party administrators ("TPA"), referred to as Symmetry's QP Partners. Fees are deducted from the plan assets in arrears on the direction of the plan between TPA and Plan Sponsor and paid to Symmetry Partners and the solicitor, if applicable, through the TPA. Symmetry's fees and if applicable, solicitor's fees, are disclosed within the Symmetry Partners Investment Advisor Agreement executed with the Plan Sponsor. Mutual fund fees are disclosed within the fund's prospectus. The TPA fees are disclosed within a separate agreement between TPA and Plan Sponsor.

Symmetry's only source of compensation is the fee of their investment advisory/management services. There may be additional fees incurred by the Plan for Plan-related services that are not provided by Symmetry, including, but not limited to, Plan administration, custody, and mutual fund fees. The cost of any such other Plan-related service(s) is not included as part of Symmetry's compensation.

All Symmetry's fees may be amended if administratively feasible and at its discretion.

The client may request that related accounts be combined in order to meet fee break points and reduce the advisory fee charged. We reserve the right to waive the advisory fee for certain accounts, such as employee accounts and personal accounts of solicitors who refer business to us. The standard fee schedules and minimum account sizes indicated for the investment advisory services are negotiable and as a result, clients with similar assets may have differing fee schedules and pay different fees. Clients who negotiate a flat fee schedule may or may not pay a higher fee than those who pay under a tiered schedule, depending on asset levels. Clients will be charged a fee on all assets (securities, cash and cash equivalents), in the account unless otherwise agreed upon between parties.

### **C. Custodian Fees and Other Expenses**

#### **Trust Company of America**

Trust Company of America will charge the lesser of 0.20% or \$500.00 per annum on accounts \$100,000 and greater. Trust Company of America will charge 0.24% on accounts less than \$100,000. All ETF and equity trades are directed through Trust Company of America to Bank of New York for trade execution.

Please see Trust Company of America's fees listed below:

<b><u>Fee Type</u></b>	<b><u>Rate</u></b>
Termination Fee	\$100.00/Account
Check Distribution Fee	\$12.50/Occurrence
Wired Funds Fee	\$15.00/Wire
Returned Check Fee	\$25.00/Occurrence
Cancelled Check Fee	\$12.50/Occurrence
Transfer Out/Asset Re-registration	\$25.00/Asset

Overnight Express	\$15.00/Occurrence
SoloK Maintenance Fee	\$200.00/Year
5500 EZ Filing (if needed)	\$125.00/Filing
SoloK Loan Fee	\$100.00/Loan

### Trading

Equities traded on foreign exchange \$250.00 per trade + \$.02 per share

Mutual Funds	No trading costs
Government Issued Bonds	\$50.00 per trade
Corporate Bonds	\$50.00 per trade
Mortgage Bonds	\$50.00 per trade
Advanced Distribution Fee	\$35.00/Occurrence

Trust Company of America fees are subject to change without notice.

Charles Schwab

### Asset Based Pricing Schedule

Assets from \$0 to \$250,000	0.15%
From \$250,001 to \$500,000	0.12%
From \$500,001 to \$1,000,000	0.10%
From \$1,000,001 and over	0.08%

### Transaction Based Pricing Schedule

Equities LIVE*:	1-999: \$0.08/share; (\$20 min)
	1001-4999: \$0.07/share
	5001-14999: \$0.06/share
	15000 - +: \$0.04/share
Equities ELEC*:	(enrolled in eDelivery) \$8.95 per trade
	<\$1MM (not enrolled in eDelivery): \$19.95 +\$0.015/share
	above 1,000
	\$1MM+ (not enrolled in eDelivery): \$8.95 per trade
Options LIVE:	\$38.95 + \$1.40 per contract
Options ELEC:	\$8.95 + \$1.40 per contract
Bonds LIVE:	\$1.20 per bond (\$10 min, \$275 max)
Bonds ELEC:	\$1.00 per bond (\$10 min, \$250 max)
Mutual Funds LIVE:	0.10% principal (\$20 min, \$74.95 max)
Mutual Funds ELEC:	0.10% principal (\$20 min, \$49.95 max)

\*LIVE = Phone order.

\*ELEC = Schwab Institutional Website.

Charles Schwab fee schedule is subject to change without notice.

Please be advised that should an account terminate with Charles Schwab, final quarter fees may not be able to be assessed.

## TD Ameritrade

TD Ameritrade will charge the lesser of 0.14% or \$300 per annum on accounts. These charges are billed monthly in arrears in the same manner as the Firm's fee is billed. There are no transactions or trading charges for mutual funds. There are additional charges for various services including, but not limited to, equity trading, terminations fees and mailroom requests. All of which are available upon request.

TD Ameritrade prices are subject to change without notice.

Please be advised that should an account terminate with TD Ameritrade, final quarter fees may not be able to be assessed.

### **D. Fees in Advance**

Symmetry does have a group of clients whose fees are deducted in advance. This is for a limited number of clients for which Symmetry is acting as a co-advisor. The clients will be charged a partial fee for the first quarter calculated in arrears. The first quarter's fee will be based on the client's initial assets under management and pro-rated from the date the assets are traded in the account. The first full quarter is calculated in advance based on the quarter-end values of a client's account on the last trading day of the previous quarter. Accounts closed mid-quarter will receive a pro-rated rebate.

Market Value on last trading day of previous Quarter X Annual Fee Percentage of Symmetry and Co-Advisor = Annual Fee Amount.

Annual Fee Amount/4=Quarterly Fee Amount

On a limited number of 401(k) plans where Symmetry is acting as an investment manager, the TPA/Custodian deducts fees in advance. Therefore, Symmetry will rebate fees as instructed and when necessary according to the TPA/Custodian program policies and procedures.

Where Symmetry acts as a sub-adviser, Symmetry will be paid an ongoing annualized fee by the broker-dealer and RIA programs. These RIA and broker-dealer fees are paid in advance based on the quarter-end values of clients' accounts on the last trading day of the quarter. Therefore, Symmetry will rebate fees as instructed and when necessary according to the respective programs' policies and procedures.

### **E. Compensation**

Symmetry Partners does not receive any transaction based compensation, including but not limited to, the sale of securities or investment products, asset based, sales charges or services fees from the sales of mutual funds.

***Performance-Based Fees and Side-By-Side Management***

Form ADV Part 2A, Item 6

Symmetry does not assess performance fees.

## ***Types of Clients***

Form ADV Part 2A, Item 7

### **A. Types of Clients**

Symmetry provides services to individuals, trusts, charitable organizations, pension and profit sharing plans, corporations, and State and government entities.

### **B. Conditions for Managing Accounts**

Clients who are interested in market timing cannot open an account at Symmetry.

On occasion, Symmetry may permit clients to maintain certain “non-discretionary” assets in their advisory accounts.

Symmetry’s GlobalCore exchange traded fund portfolios are not available for qualified plans.

#### *Minimum Account Size*

##### *For Mutual Fund Portfolios*

The minimum account size is \$10,000. The firm may waive this minimum on a case by case basis. Clients may make cash additions to the account at any time and may withdraw assets from the account on written notice to the Firm.

##### *For Exchange Traded Fund Portfolios*

The minimum account size is \$10,000. The firm may waive this minimum on a case by case basis. Clients may make cash additions to the account at any time and may withdraw assets from the account on written notice to the firm.

For all amounts mentioned in this section, Symmetry may amend if administratively feasible and at its discretion.

#### *Mutual Fund and ETF Allocations*

Please be advised that because Symmetry Bond utilizes Vanguard mutual funds, investors may be subject to the fund's frequent trading limitations. Symmetry Bond is not a money market alternative and moving money in and out can trigger the Vanguard frequent trading restriction.

Because excessive transactions can disrupt management of a fund and increase the fund’s costs for all shareholders, the board of trustees of each Vanguard fund places certain limits on frequent trading in the funds. Each Vanguard fund (other than money market funds and short-term bond funds) limits an investor’s purchases or exchanges into a fund account for 60 calendar days after the investor has redeemed or exchanged out of that fund account. ETF Shares are not subject to these frequent trading limits.



## Mutual Fund Portfolios

Clients' investments may not match exactly the target allocations for the applicable model portfolio due to a variety of implementation factors, including but not limited to: the custodian or trading platform's own trading algorithm, any changes in price that from the time the positions are calculated to the time they are actually traded. In some cases for certain custodians, positions with small allocations may be eliminated altogether. Symmetry may determine not to implement for a client changes made to the applicable model portfolio due to client-specific factors, such as the desire to avoid realizing capital gains or otherwise.

The holdings comprising the model portfolios and the allocations to those holdings have changed over time and may change in the future.

## Exchange Traded Fund Portfolios

Clients' investments may not match exactly the target allocations for the applicable model portfolio due to a variety of implementation factors, including but not limited to: the custodian or trading platform's own trading algorithm, any changes in price from the time the positions are calculated to the time they are actually traded and the fact that ETFs can only be purchased in whole shares. In some cases for certain custodians, positions with small allocations may be eliminated altogether from time to time. Symmetry may determine not to implement for a client changes made to the applicable model portfolio due to client-specific factors, such as the desire to avoid realizing capital gains or otherwise.

The holdings comprising the model portfolios and the allocations to those holdings have changed over time and may change in the future.

The firm typically maintains a 2% cash position in each portfolio. The cash positions will be invested in a money market fund which will vary depending on the custodian.

Changes to portfolio holdings which comprise the portfolios may have tax consequences. If you sell assets in a taxable account, you may have to pay tax on any gain. While Symmetry seeks to mitigate tax exposure when possible, it is likely that investors will incur a taxable event while being invested in the portfolios.

## *Operational Requests*

Some requests, including but not limited to, distributions and liquidations will ordinarily be processed on the same day if received by Symmetry, in good order, by 12 noon EST. All requests received after 12 noon EST will be handled on a best efforts basis.

Please note that Symmetry will use best efforts to invest deposits and process model change requests within 5 business days of receipt. Distributions from accounts may take up to 10 business days from receipt of request due to settlement dates, administrative duties and other involved institutions' various timelines. Please note that distributions or transfers related to the closing of an account may take up to 30 business days.

On occasion a client who has retained the services of Symmetry Partners, will transfer their current holdings to the receiving custodian, (one of the custodians Symmetry is utilizing), in kind. When this occurs, Symmetry Partners, LLC will liquidate all securities received in kind as soon as administratively feasible, provided there is a market (U.S.) for the security.

A client who does not want those securities liquidated must request so in writing and must request and execute transfer documentation to have the in-kind securities returned to the originating custodian. If the transfer documentation is not received by the custodian within 30 days of receiving the in-kind securities, then Symmetry Partners will liquidate those securities.

#### *Symmetry e-Advisor®*

Symmetry has engaged the services of a third party service provider to create the Symmetry e-Advisor platform. The purpose of the platform is to assist advisors or representatives and clients with various aspects of the Symmetry business such as, but not limited to, the account process, suitability documents, account opening paperwork, trading, proposals, and status of transfer of funds from one institution to another and client reports.

In addition, the platform provides the advisors or representatives with various tools and programs designed to help meet and enhance the clients' experience with Symmetry. The platform offers resources such as, but not limited to, marketing material, research notes and white papers to help better understand Symmetry's investment philosophy, analysis on recent market events, and general tips on the advisory business.

Symmetry may limit access to these various programs based on factors such as, but not limited to, the solicitor's representative's commitment to understanding Symmetry's investment philosophy and how many assets the representative has referred to the Symmetry program.

#### *Trade Error Process*

Symmetry's policy and practice is to monitor and reconcile all trading activity; Symmetry seeks to identify and resolve trade errors in a reasonable timeframe to assure the client has been made whole; document each trade error with appropriate supervisory approval; and maintain a trade error file. Symmetry does not engage in any soft dollar arrangements to correct trades, and does not correct trades by selling to or purchasing securities from other clients' accounts.

#### *Trust Company of America*

If a trade error is made on a clients account maintained by Trust Company of America, the client is ordinarily made whole by correcting the trade error through the use of an error account with the custodian. Any consequent losses are absorbed by the party at fault: Symmetry, advisor, custodian, and/or broker-dealer.

#### *Charles Schwab*

If a trade error is made on a clients account maintained by Charles Schwab, the client is ordinarily made whole by correcting the trade error through the use of an error account with the custodian. Any gains generated by errors are transferred to the error account and used to offset future error losses until quarter end. At quarter end, gains remaining in error account over \$100.00 will be donated to charity. If a loss occurs greater than \$100.00 and there is no gain to offset the loss in the error account, the party at fault for the error (i.e. Symmetry, the advisor, the custodian, or the broker dealer) will pay for the loss. Schwab will maintain the loss or gain if it is under \$100.00 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted. Further, in certain circumstances, a client's account may be made whole through a deposit to the account with the appropriate amount to rectify the error.

#### TD Ameritrade

If a trade error is made on a clients account maintained by TD Ameritrade, the client is ordinarily made whole by correcting the trade error through the use of an error account with the custodian. Any gains generated by errors are transferred to the error account and used to offset future error losses. If a loss occurs greater than \$100.00 and there is no gain to offset the loss in the error account, the party at fault for the error (i.e. Symmetry, the advisor, the custodian, or the broker dealer) will pay for the loss. If the gain or loss is under \$100.00, the funds will be kept in the error account to minimize and offset the custodian's administrative time and expense.

**A. Method of Analysis and Investment Strategies**

Symmetry Partners' methods of analysis and investment strategies are based on academic research into optimal investing, with an emphasis on Modern Portfolio Theory. Symmetry's analysis methods may include: use of MPT metrics such as return, standard deviation, Sharpe Ratio, etc.; regression analysis to determine risk factor exposure, and Monte Carlo simulation to consider probability of outcomes. Please see definitions of these terms below. Symmetry's investment strategies consist of equity and fixed income components (or one or the other) and are comprised of open-end mutual funds and exchange traded funds. The Symmetry equity strategies are broadly diversified across global markets and are "passively managed" with respect to market timing and stock picking, meaning that we do not engage in these activities. The firm does overweight or underweight at the asset class level in an effort to capture premiums that have historically been available. Symmetry's fixed income strategies are generally shorter term in nature and primarily investment grade or higher quality depending upon the strategy.

Modern Portfolio Theory: Put forth by academics such as Nobel-Prize Winner Harry Markowitz, Modern Portfolio Theory is a method for investing assets in such a way as to maximize the amount of return offered by the investment per unit of risk taken.

MPT Metrics: Modern Portfolio Theory metrics such as return, standard deviation, and Sharpe Ratio.

Return: A measure of the amount the investment has earned as a percentage of the amount that was invested.

Standard Deviation: A measure of volatility or the dispersion of returns that the investment has experienced. A high standard deviation indicates a wide dispersion, which is considered to indicate a higher risk than an investment with a low standard deviation.

Sharpe Ratio: A measure that combines return and standard deviation in an attempt to show the client the amount of return the investment offered for the level of risk that was taken. Specifically, Sharpe ratio measures the return of the investment over and above the return that could have been obtained in a relatively risk free investment instrument (such as Treasury Bills), divided by the standard deviation of that additional return.

Regression Analysis: A statistical measure that attempts to determine whether there is a relationship between two or more variables. Regression analysis is often used to determine whether the behavior of one investment asset is dependent upon the behavior of one or more other assets. For example, whether the performance of a certain mutual fund is dependent upon the performance of the stock market in general.

Monte Carlo Simulation: A software tool that runs multiple trials of the same analysis, with changes in inputs for each trial, so that the analyst can get a sense of the probability of various outcomes given numerous possible inputs.

As with any investment strategy, there is a possibility of loss. No current or prospective client should assume that future performance of any specific investment strategy or product made reference to

directly or indirectly in this material will be profitable.

## **B. Risk of Loss Involved for Investment Strategy**

The primary risk inherent in using Modern Portfolio Theory metrics is that these measures are necessarily based on historical returns. If a fundamental shift in relationships among the various asset classes or other inputs should occur, historical data will no longer accurately represent what can be expected going forward. Additionally, MPT metrics require good data, and will be compromised by any inaccuracies in the input information. Regression analysis and Monte Carlo simulations both use the same historical data as is used in the calculation of MPT metrics and are therefore open to the same issues. Symmetry does not make predictions about future returns and therefore generally does not use “forward-looking” forecasts as inputs for its analyses.

There are inherent risks in passive investment management, including the risk of the manager not capturing the desired asset class, as well as the risk that the client’s return will suffer from any market risk. Passive management implies that no attempt is made to “shield” the investor from down markets by selling out of investments. Diversification is used to mitigate risk, but while spreading assets out among various equity securities can reduce idiosyncratic or “specific” risk of overweighting any one investment, it does not protect the client from the aforementioned market risks. Symmetry’s decision to overweight certain asset classes, such as but not limited to, value stocks and small cap stocks entail the risk that these asset classes underperform the broader market. Symmetry investments are diversified globally, which means that they take on risks inherent in investing in international and emerging markets economies including, but not limited to, currency risk.

Symmetry investment strategies typically do not involve frequent trading, as such, Symmetry’s strategy does not expose the client to that risk. However, the client should be aware of the following general rules when investing. Higher potential return generally involves greater risk, short term volatility is not uncommon when investing in various types of funds including, but not limited to: sector, emerging markets, small and mid-cap funds. International investing involves special risks such as currency fluctuation, lower liquidity, political and economic uncertainties, and differences in accounting standards. Risks of foreign investing are generally intensified for investments in emerging markets. Risks for emerging markets include risks relating to the relatively smaller size and lower liquidity of these markets, high inflation rates and adverse political developments. Risks for investing in international equity include foreign currency risk, as well as, fluctuation due to economic or political actions of foreign governments and/or less regulated or liquid markets. Risks for smaller companies include business risks, significant stock price fluctuation and illiquidity. Investing in real estate entails certain risks, including changes in: the economy, supply and demand, laws, tenant turnover, interest rates (including periods of high interest rates), availability of mortgage funds, operating expenses and cost of insurance. Some real estate investments offer limited liquidity options. Investing in higher-yielding, lower-rated bonds has a greater risk of price fluctuation and loss of principal income than U.S. government securities, such as U.S. Treasury bonds and bills. Treasuries and government securities are guaranteed by the government for repayment of principal and interest if held to maturity.

As with any investment strategy, there is a possibility of loss. No current or prospective client should assume that future performance of any specific investment strategy or product made reference to directly or indirectly in this material will be profitable. Diversification is intended to reduce volatility by spreading your investment dollars into various asset classes to add balance to your portfolio. Using this methodology, however, does not guarantee a profit or protection from loss in a declining market.

### **C. Risks of Specific Securities Utilized**

Symmetry recommends both open-ended mutual funds and exchange traded funds. The following are risks involved with these investments.

#### *Exchange Traded Funds*

ETFs do not sell individual shares directly to investors and only issue their shares in large blocks. Exchange traded funds are subject to risks similar to those of stocks. Investment returns will fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. ETF shares are bought and sold at market price (which may be higher or lower than NAV) and are not individually redeemed from the fund. Brokerage commissions will reduce returns. An investor should consider investment objectives, risks, charges and expenses before investing. A description of these risks can be found in each ETF's prospectus.

#### *Mutual Funds*

Past performance does not guarantee future results. The investment return and principal value of a mutual fund will fluctuate so that an investor's shares, when redeemed, may be worth more or less than their original cost. Investors should consider the investment objectives, risks, and charges and expenses of the investment company carefully before investing. A description of these risks can be found in each fund's prospectus.

As with any investment strategy, there is a possibility of loss. No current or prospective client should assume that future performance of any specific investment strategy, product or non-investment related content made reference to directly or indirectly in this material will be profitable.

***Disciplinary Information***

Form ADV Part 2A, Item 9

Not Applicable.

**A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Symmetry Partners and members of the management personnel are not registered, nor do they have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

**B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.**

Symmetry Partners and members of the management personnel are not registered, nor do they have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

**C. Arrangements with Related Persons**

Symmetry Partners and members of its management personnel do not have any relationship or arrangement with any related person listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships.

**D. Selection of other Advisors or Managers**

Symmetry Partners does not recommend or select other investment advisers for clients.



**A. Code of Ethics**

The Symmetry Partners' Code of Ethics sets the tone for the conduct and professionalism of the firm. The code's principles and policies are designed to emphasize the fiduciary duty required of all of Symmetry's employees. In addition, these same principles and policies detail the requisite processes for compliance with the applicable Federal Security laws such as, but not limited to, insider trading and personal securities transactions. The goals of the Symmetry Partners' Code of Ethics are to protect the firm's clients and the firm's reputation by educating employees about their fiduciary duty and the laws governing their conduct. The firm's employees take their positions of trust seriously and must act professionally and with complete propriety at all times. A copy of the Symmetry Partners Code of Ethics is available upon request by calling 800-786-3309.

**B. Material Financial Interest**

Symmetry or a related person has no financial interest of any kind in the same securities it recommends to its clients.

**C. Invest in the Same Securities that are Recommended to Clients**

All employees and related persons of Symmetry are prohibited from profiting at the expense of clients and competing with clients with respect to transactions in "reportable securities" as defined in Rule 204A-1(e)(10) under the Investment Advisers Act of 1940. Symmetry employees' and related persons' personal transactions in reportable securities are reviewed on a quarterly basis to assure compliance with all personal security transaction policies. Because the securities recommended by Symmetry, including shares of mutual funds and ETFs, are generally not "reportable securities," the Symmetry Code of Ethics does not ordinarily limit the ability of Symmetry's employees and related persons to invest in same open-end mutual funds and ETFs that are recommended to clients.

**D. Buy or Sell Securities for Client's Accounts at or about the same time it Buys the Same Securities for its Own Account.**

Symmetry recommends only transactions in open-end mutual funds and ETFs. Symmetry does not transact in such securities.

**A. Selecting or Recommending Broker-Dealers for Client Transactions**

Symmetry does not recommend transactions in securities other than shares of mutual funds and ETFs. As such, Symmetry does not recommend broker-dealers for client transactions. Symmetry would seek best execution of client transactions were it to choose a broker-dealer to execute client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction but the best overall qualitative execution in the particular circumstance. Transactions in mutual fund shares are effected directly between a client's custodian and the mutual fund or its agents. Because such transactions are, pursuant to Rule 22c-1 under the Investment Company Act of 1940, required to be effected at a price based on the net asset value of such shares next computed after the order to purchase or sell such shares is received, and clients do not pay any sales loads in connection with such transactions, a price based on the net asset value of the mutual fund shares next computed after the order to purchase or sell such shares is received will be the most favorable trade execution reasonably available. At present, there are three custodians that are operationally set up to maintain client accounts, and each client selects his or her own custodian. In selecting its custodian, each client will be deemed to have directed Symmetry to effect any transactions in ETF shares through such broker as the client's custodian may from time to time direct.

*Other*

Symmetry clients utilize the services of other custodians due to the particular services the client is receiving. As such, there are custodians who hold 401(k) plan assets for clients that utilize the services of Third Party Administrators'.

**1. Research and Other Soft Dollar Benefits**

Symmetry does not in any way direct clients to a broker dealer or custodian for the exchange of products, research or services.

**2. Brokerage for Client Referrals**

Symmetry does not in any way direct clients to a broker-dealer or third party for client referrals.

**3. Directed Trades**

As noted above, each client directs its own trades with respect to ETFs. As a result, the client may incur higher commissions, greater spreads or less favorable net prices than if the client had chosen a different custodian and thereby directed Symmetry to execute ETF trades through another broker-dealer. Symmetry may not be able to obtain best execution for such trades.

**B. Trade Aggregation**

Although Symmetry does not aggregate trades for execution, Symmetry transmits instructions with respect to transactions in mutual funds and ETFs to its clients' custodians at various times throughout the day, and instructions with respect to transactions on behalf of multiple clients with the same custodian may be transmitted at the same time. Client transactions in ETFs may be held for

part of a trading day until the next regular transmission to their custodians, which may adversely affect the price at which they are effected. A client's custodian may aggregate such orders for execution.

Please note that trades are aggregated with each custodian separately. Depending on the number of shares traded, the custodians may participate in a trade rotation process. The trade rotation process provides objective preference to the custodian by submitting trades for each custodian in sequence starting with a different custodian on each series of block trades. The starting custodian moves down one position on the list at the start of each new trading day. The submission process for each custodian is done in an efficient timely manner. Trust Company of America is not part of the trade rotation process.

## ***Review of Accounts***

Form ADV Part 2A, Item 13

### **A. Frequency, and Responsible Parties of Periodic Reviews**

Client accounts are monitored on a periodic basis, annually and as needed. For the solicited client, the solicitor's investment adviser and registered representative who referred the account to Symmetry's management will conduct the review. Symmetry has supervised persons, called the Advisor Services Group, who support the advisers in conducting the review. Symmetry's support staff will, but not limited to, do the following in support of the adviser: answer questions the advisor may have regarding the account, provide information to the advisor that may be helpful in reviewing the account, and review information with the advisor.

For the direct client, accounts are monitored on a periodic basis, annually and as needed. Financial plans are reviewed on an annual basis and as needed with the client. Symmetry's investment adviser representatives conduct the reviews.

For institutional and municipality accounts, reviews are conducted quarterly, annually and as needed. The reviews are conducted by Symmetry's investment advisor representatives.

### **B. Factors that will trigger a non-periodic review**

A non-periodic review of a client's account can be triggered by a change in the client's financial circumstances such as, but not limited to, termination of employment, moving or retirement. A material market event could also trigger a review.

### **C. Reports**

Clients receive either a quarterly or monthly statement from the custodian. Symmetry's website platform, Symmetry e-Advisor, as previously mentioned in Section 7 of this brochure, provides quarterly performance reports of clients' accounts for advisors or representatives to share with clients. In addition, the platform offers other tools to assist the advisors or representatives with the review of clients' accounts such as, but not limited to, research notes, white papers, and analysis on related market events.

## ***Client Referrals and Other Compensation***

Form ADV Part 2A, Item 14

### **A. Individual who is not a Client Provides an Economic Benefit in Connection with Giving Advice to Client**

Symmetry does not receive any economic benefit including, but not limited to, a commission, equipment, research services, sales awards and prizes from a non-client in connection with giving advice to clients.

### **B. Indirect or Direct Compensation to Third Parties for Client Referrals**

#### *Indirect Compensation*

Symmetry does not compensate any third party for clients' referrals such as, but not limited to, directing transactions to a broker for client referrals.

#### *Direct Compensation*

Symmetry Partners, LLC, enters into Solicitor's agreements with unaffiliated independent Broker-Dealers and Registered Investment Advisers who then offer Symmetry's investment supervisory services to clients through its investment adviser and registered representatives.

Symmetry adheres to the solicitor's rule pursuant to the Investment Advisers Act Rule 206(4)-3. All material information describing the solicitor's activities and compensation is disclosed to the client in solicitor's disclosure statement, which is part of Symmetry Investment Advisory Agreement. The fee is deducted by the custodian from the client's account per the instruction of the client. The fee is structured in terms of an annual fee based on the client's assets under management. After the custodian deducts the fee, Symmetry is responsible for paying the solicitor. Symmetry calculates the total fee owed to the solicitor on a quarterly basis along with a spreadsheet, which identifies for the solicitor what portion of the total fee should be distributed to each solicitor's investment adviser and registered representatives. The total fee and spreadsheet is then sent to solicitor who is responsible for distributing the applicable amount to each of its investment adviser and registered representatives.

Symmetry may enter into marketing arrangements with the solicitor or solicitor's representative. The purpose of which is to provide marketing support to introduce our mutual services to the public. Such services include, but are not limited to, sponsoring of educational seminars and client events, paying for publication of an advertisement, payment for attendance/access to solicitor's marketing programs designed to support solicitor's investment adviser and registered representatives, assisting in the development of marketing pieces, reimbursing solicitor's representatives the cost of attending meetings/seminars for the purpose of learning Symmetry's advisory business, and other marketing initiatives. Symmetry also may enter into similar marketing arrangements with the Broker-Dealers/Registered Investment Advisers and the investment adviser or registered representatives of those firms where Symmetry acts in a sub-advisor/model manager capacity.

## ***Custody***

### Form ADV Part 2A, Item 15

Symmetry Partners, LLC has custody of clients' assets, but custody is limited to the specific circumstance of fees being deducted from clients' accounts. When a client opens an account with Symmetry, the assets are held with a qualified custodian. Clients will receive monthly or quarterly account statements, depending on the custodian. Please review the statements carefully for accuracy of information. In addition, Symmetry's website platform, Symmetry e-Advisor, as previously mentioned in Section 7 of this brochure, can provide advisers quarterly performance reports of clients' accounts to share with clients. When reviewing this report, please note that this report does not take the place of brokerage statements, any fund company statements, or 1099 tax forms. The client is urged to compare this report with the statement received from the custodian covering the same period.

### ***Investment Discretion***

#### Form ADV Part 2A, Item 16

Prospective clients of Symmetry are asked to sign an investment advisory agreement with the firm outlining the responsibilities for each party. By signing the agreement, the client grants Symmetry discretionary authority to implement all investment decisions such as, but not limited to, investment selection, asset allocation and rebalancing. This discretion is limited only by the reasonable restrictions the client may place on the account. Symmetry will assist the client in understanding and evaluating the possible impact of these restrictions on the account. Symmetry typically maintains a cash balance in each portfolio. Clients appoint Symmetry as client's agent and attorney-in-fact with respect to trading authorization. Symmetry manages the asset allocation on a continuous basis and all allocation and investment decisions are reviewed and monitored.

### ***Voting Client Securities***

Form ADV Part 2A, Item 17

#### **Proxy Voting Statement**

A. When granted discretion to vote proxies, Symmetry's guidelines are reasonably designed so that proxies are voted in the best interest of the clients pursuant to our fiduciary duty under the Investment Advisers Act of 1940. We will also abide by our fiduciary duty of prudence and loyalty under ERISA when voting proxies for a qualified plan. For a copy of our proxy voting policy, how a client may instruct us to vote a particular solicitation, or should they wish to ask how the proxies were voted please contact our Research department at 800.786.3309 or [research@symmetrypartners.com](mailto:research@symmetrypartners.com).

B. Symmetry's standard policy regarding discretion to vote proxies is as follows: Unless Symmetry and client otherwise agree in writing, Symmetry is precluded from and the Client shall be responsible for: (a) directing the manner in which proxies solicited by issuers of securities you beneficially own shall be voted; and (b) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the securities in the account. Client authorizes and directs the custodian to forward to the client all proxies and shareholder communications relating to the assets. Should the client wish to grant Symmetry discretion to vote proxies they must do so in writing, and such voting authority will not be effective until accepted in writing by Symmetry.

For more information regarding these requests please contact [research@symmetrypartners.com](mailto:research@symmetrypartners.com) or call 800.786.3309 and ask for the Research department.



***Financial Information***

Form ADV Part 2A, Item 18

Symmetry is required to disclose certain information to clients regarding financial matters of the firm.

A. Symmetry does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

B. Symmetry has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

C. Symmetry has not been subject of a bankruptcy petition at any time.