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1. to place the interests of clients first at all times;
2. to have a reasonable basis for its investment advice;
3. to seek best execution for client securities transactions where the adviser directs such transactions;
4. to make investment decisions consistent with any mutually agreed upon client objectives, strategies, policies, guidelines, and restrictions;
5. to treat clients fairly;
6. to make full and fair disclosure to clients of all material facts about the advisory relationship, particularly regarding conflicts of interest; and
7. to respect the confidentiality of client information. This fiduciary duty differs from the suitability obligations that govern brokers.

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