

November 10, 2022 4th Quarter Mandatory Webinar



Your presenters today are: Jess, Tony & MaryLynne

NOTE: Please remember that in order to get credit for attending this webinar you need to be logged in with your Trustmont approved email using a computer or the GoToWebinar app. If you are in listen only mode it will NOT register your attendance and you would have to view the make-up link. **You MUST be able to see the slides***

- If you have an idea of something you want to see featured in our monthly newsletter, please send us an email or give us a call.
- If you have any comments or questions, they may be typed in at any time and we will address them as we go or at the end







October's **Check Log** is due **November 15th** October's **Correspondence Log** is due **November 15th**

MANDATORY

Webinar Schedule - 2023

February 9, 2023 May 11, 2023 August 10, 2023 November 9, 2023

*LINKS to register will be on the Trustmont website



Make sure to check the website for additional important reminders



New CE Rules for Registered Reps



PLEASE DO NOT WAIT UNTIL LAST MINUTE TO COMPLETE!

What you need to know?!?!

*Continuing education requirements will change effective January 2023 from every 3 years to **EVERY YEAR**

*there will no longer be a 3 month window to complete

*you have the entire year to complete; must be done prior to December 31st

*you will receive an email from FINRA (*email used when setting up FINPRO account*) at the beginning of each year; it will be up to everyone to complete on their own or risk becoming CE inactive

NOTE: If inactive the rep can not talk to clients, advise new clients or receive commissions *if your window opens in December of 2022, your window will reset January 1, 2023 and you will have until the end of the year to complete

New SEC Marketing Rule





What you need to know...

Annual Compliance Meeting



Will be completed online thru Reged.com Due by: November 30, 2022 *check your email for login instructions



A secure email will go out to every representative/advisor starting tomorrow that will include the ARQ for 2022. It will be coming secure due to the certification of holdings form that contains your personal information. The 2022 ARQ is 9 pages long and needs to be completed and returned to compliance@trustmontgroup.com by the close of business on Friday, 11/18/2022



Page 1 Note: questions are in a different order than previous years so that it flows logically

Q1-4 Reporting requirements Q5-14 Best Practices Q15-16 E&O and Disclosures

Q17-18 Regulation Best Interest and CRS

Q19-20 CPF & Negative Response letters Q21 InvestorCOM (NEW)

	2022 Annual Questionnaire and Conflicts of Interest Disclosure including Ethics Policy
	Rep Name
	Please <u>read</u> and <u>initial</u> in each box to certify understanding and compliance. If you are unable to initial in any box a written explanation must be provided. A word of caution: this document is considered an annual examination which can and will be reviewed by the SEC, FINRA, and State regulators. Your answers will have an impact on the findings of any regulatory audit. Failure to complete and return by the due date may result in the suspension of your license(s).
	1. I have reported all written and/or verbal customer complaints that I have received in the last 12 months. I understand that any complaint I receive must be reported to compliance within 48 hours. If none, check here and initial in the box to the left. If you are unable to initial box, explain in space provided on page 5.
	 In the past 12 months, I have disclosed to Trustmont if I have been the subject of a regulatory exam or inquiry. (Explain on page 5 if applies)
	 In the last 12 months, I have reported all material compliance matters and/or potential conflicts of interest to the Chief Compliance Officer (CCO) at Trustmont. (Explain on page 5 if applies)
	4. In the past 12 months, I have reported any unsatisfied judgements or liens filed against me. (Explain on page 5 if applies)
	5. In the past 12 months, I have not engaged in any sales activity in a state in which I am not licensed. I understand that I am solely responsible for ensuring that I am appropriately licensed.
	6. In the past 12 months, I have not exercised discretion in any non-advisory account without the client's written approval and Trustmont's written consent. I have obtained client permission for every trade unless the client has granted written authorization to exercise discretion and Trustmont has approved such authority. Discretion is defined as making investment decisions for the account concerning the security, number of shares or units, and whether to buy or sell. The authority to decide only timing or price does not constitute discretion.
	7. I have disclosed to Trustmont if I and/or any members of my family, or any of my clients are on the board of directors or an owner of 5% or more of the stock of any publicly-traded company.
	8. During the last 12 months, I have not been in receipt of any material nonpublic information about any publicly-traded company.
	9. I understand that I am not permitted to trade on any nonpublic information.
	10. I advise customers of the availability of mutual fund breakpoints.
	II. I do not promise or guarantee performance of any transaction(s).
	I2. In the past three years, I have not accepted cash from a client. I have not accepted a check made payable to me, my DBA or Trustmont. I have also not taken possession of a customer security.
	13. During my registration at Trustmont I have never loaned money to a customer, borrowed money from a customer, or co- invested with a customer at any time, without prior written approval from Trustmont. (Explain on page 5 if any apply)
	14. I do not share commissions or fees with any unregistered entity, individual, or client/customer.
	15. I understand that the Trustmont E&O policy only covers products and services sold through Trustmont.
	16. In the past 12 months, I have provided the Privacy Disclosure Statement, CIP Notice, SIPC information, and Business Continuity Plan to each new prospective client. As well as the ADV 2A & 2B, if advisory.
	17. I understand that I am required to provide Form CRS to customers/potential customers when a recommendation is made of particular securities, investments, and/or investment strategies.
	18. I understand that I am required to maintain a record of everyone to whom the CRS has been provided and that Trustmont can and may request a copy of that record at any time.
	19. In the past 12 months, I have provided clients with a copy of the principally signed Client Profile Form (CPF) when completing new business, material changes or 36-month updates.
	20. In the past 12 months, I have provided a copy of all negative response letters utilized to process client 36-month account information verifications and any responses received as a result of those letters to Trustmont's operations department.
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	2022 ARQ/Cyber Security/Ethics Policy/Holdings

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FORM CRS DELIVERY

Delivery requirements for Form CRS—Brokerage and Advisory:

<u>New/prospective retail customers</u> before or at the earliest of:

o A recommendation of an account type, securities transaction, or investment strategy involving securities

o Placing an order

o The opening of a brokerage account

Existing retail customers before or at the time the firm

o Opens a new account that is different than the customer's existing accounts



o Recommends a rollover of assets from a retirement account into a new or existing account or investment

o Recommends or provides a new service or investment that does not necessarily involve the opening of a new account.

When mailing Form CRS, you can send it by itself or include it in a package of documents, but it must be the **first document in the package**. If delivery is electronic, it must presented "prominently" as a direct link or in the body of an email or message.



FORM CRS RECORDS

Recordkeeping Requirements (applies to both Brokerage and Advisory): A record must be kept of every person to whom Form CRS was given, the date it was given and the method of delivery (paper or electronic). Evidence to show delivery and consent to electronic delivery is required.

The account opening cover page must be completed each time Form CRS is provided to a customer or prospect, even if a new account is not being opened.

In the event that a new account is not opened, the cover page is to be kept in a file in your office and made available to Compliance upon request.



If a new account is opened, the cover page is to accompany your account opening documents when submitting the paperwork to the home office for approval. Accounts will not be approved without the cover page.

Should a customer call or email your office requesting a copy of Form CRS, immediately forward the request to compliance@trustmontgroup.com. We will handle the mailing of Form CRS to the customer and maintain the record.

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	7.1 have disclosed to Trustmont if I and/or any members of my family, or any of my clients are on the board of directors or an owner of 5% or more of the stock of any publicly-traded company.
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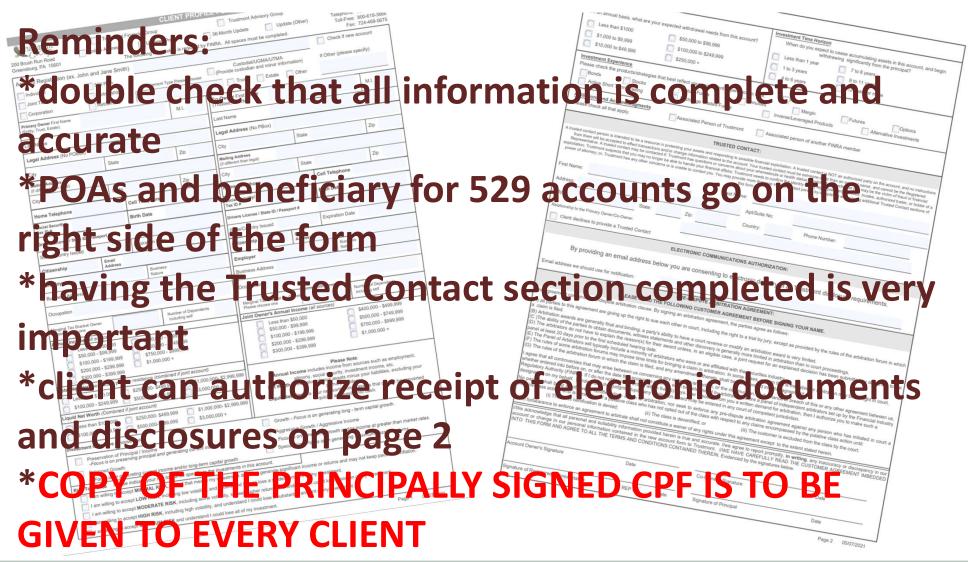
Q19 **CPF**

Q20 Negative Response letters Q21 InvestorCOM (NEW)

2022 ARQ/Cyber Security/Ethics Policy/Holdings

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Client Profile Form



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Q19 CPF

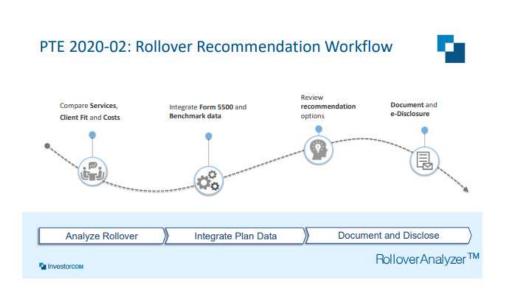
Q20 Negative Response letters

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Q21 InvestorCOM (NEW)

Investorcom

- Available on the Trustmont website. It can be found under the "Potentially Required" list under each section in the forms library.
- The Rollover Analyzer Tool will help us to stay compliant with the Department of Labor Prohibited Transactions Exemption 2020-02.
- This tool provides appropriate disclosures and compliant rollover recommendations.
- It is required for all IRA to IRA, Plan to IRA, and Plan to Plan transfers.
- ✓ NOTE: It is **NOT** required for the establishment of NEW IRAs.
- This went into effect on 6/1/2022.



RolloverAnalyzer in Four Steps

- Step 1: Log into the Compliance Platform and RolloverAnalyzer.
- Step 2: Engage your client on:
 - o Service
 - o Fit
 - Cost comparisons
- Step 3: Review your analysis.
- Step 4: Disclose and document your Recommendation.

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Page 2 Q22-28 Compliance Requirements

Q27-28 Political Contributions (NEW)

Q29 TFG-Financial & TAG-Advisory Q30-33 Email

Q34-35 Cyber Security

Q36 Devices

Q37 Cellphone Use

Q38 Voicemail Disclosures

Q39 Outside Business Activities

Q40 U4 (<u>https://finpro.finra.org</u>)

Q41-42 Personal Accounts

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	24. In the past 12 months, I have submitted all the monthly logs required. This includes correspondence logs and check register logs via the Trustmont website (<u>www.trustmontgroup.com</u>).
	25. In the past 12 months, I have submitted the required gift logs quarterly via the Trustmont website (<u>www.trustmontgroup.com</u>).
	26. In the past 12 months, I have not given any customer gifts that exceeded a value of \$100, nor have I received a gift from a customer that has a value exceeding \$100.
	27. I understand that I must complete the political contribution log located on the Trustmont website (<u>www.trustmontgroup.com</u>) on a quarterly basis detailing contributions made by me or any member of my household (including spouse, domestic partner, minor children, or other dependents residing in my home) ONLY if making contributions. I certify all contributions for the current year have been reported.
-	28. I understand that I must request approval for any political contributions over \$250, prior to making the contribution by notifying the compliance department in writing. I certify that all contributions over \$250 have been approved.
	29. During the last 12 months, I have reviewed Trustmont's written supervisory procedures and Trustmont's compliance manuals located on the Trustmont website (<u>www.trustmontgroup.com</u>). I acknowledge that I understand and intend to comply with all current policies and procedures outlined within. <u>Manuals reviewed</u> : <u>WSPs</u> <u>TFG</u> <u>TAG</u>
	30. I only use my Trustmont approved email address for all securities-related communications and I understand that I may not publish an unapproved email on business correspondence or provide to clients.
<u> </u>	31. I have included a signature on my outgoing emails to identify myself to clients and business associates.
	32. I understand that I must notify Trustmont when I will be away from my office for an extended period of time and unable to respond to my clients in a timely manner. I understand that I must have an out-of-office reply placed on my email in such instances and maintain the proper voicemail message on my phone.
	33. I understand that when transmitting personal and private information via email that it is my responsibility to safeguard the information by utilizing the <u>SECURE</u> email system.
	34. I am familiar with Trustmont's Written Supervisory Procedures (WSP's) on protection of digital customer information and comply with its requirements in the event that I download, create, and/or maintain customer non-public personal information, such as social security numbers, accounts numbers, bank routing numbers, etc., on a desktop computer or portable device.
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	35. In the past 12 months, I have reviewed, understand, complied with, and intend on continuing to comply with all current policies and procedures regarding Cyber Security and the protection of digital customer information. If changes to my cyber security have occurred, I agree to complete and return the certification form located on the Trustmont website (<u>www.trustmontgroup.com</u>).
	36. I have notified Trustmont of any changes, additions, or discontinuations to my electronic devices by completing the certification form on the Trustmont website (<u>www.trustmontgroup.com</u>).
	37. I have disclosed to Trustmont the use of a cell phone in my securities business if applicable. I also certify that my cellphone voicemail has the proper disclosure as listed on the Trustmont website. PROVIDE cell phone#:
Ê.	38. I have the proper Trustmont voicemail disclosure message on the phone number(s) used in my securities business.
	39. I have disclosed and received written approval for all outside business activities/private securities transactions. I retain a copy of the approval in my files. I am responsible for submitting any new ventures or changes for approval to be updated on my U4.
] 40. I certify that I have reviewed my U-4 on <u>https://finpro.finra.org</u> .and all information contained therein is true and correct. I understand that I am solely responsible for verifying the accuracy and content of this information. I also understand that I have an ongoing responsibility to have my U4 amended when any of the information changes by reporting such changes to Trustmont.
	141. I have notified Trustmont of all securities accounts (this includes Bitcoin/crypto currency) held by me personally or a member of my household and verified that confirmations and statements are being sent to the Trustmont Compliance Department. I am aware that I must obtain approval prior to opening any new outside brokerage accounts. I acknowledge that for all brokerage accounts held outside of Trustmont, I will be charged \$100 annual fee per account.
	42. In the past 12 months, I have received pre-clearance for all covered security transactions made by me or any member of my household in all of my/our personal accounts.





Political Contributions Quarterly Log

List below any political contributions that have been made by the adviser, or a member of the immediate household below (note: this comprises all political contributions, including but not limited to state representatives, school board candidates, political action committees, presidential campaigns, etc.):

Recipient of Contribution	Date of Contribution	Dollar Amount	Prior approval?
	· · · · · · · · · · · · · · · · · · ·		

I verify that the statements made in this Certification are true and correct. I understand that false statements herein are made subject to the criminal penalties of 18Pa. C.S. 4909 relating to unsworn falsification.

Registered Representative's Signature/ Date

Political Contributions

*Political Contributions Quarterly Log is required quarterly only if you are making contributions

*It is available on the Trustmont Website & should be emailed to <u>compliance@trustmontgroup.com</u> or faxed to 724-468-5675 quarterly or as contributions are made throughout the year

*All advisors and registered representatives MUST have all political contributions of \$250 or more per individual per election pre-approved by the firm's compliance department prior to making the donation. THESE REQUESTS SHOULD BE EMAILED TO COMPLIANCE@TRUSTMONTGROUP.COM WITH THE SUBJECT LINE OF POLITICAL CONTRIBUTION FOR APPROVAL. PLEASE INCLUDE AMOUNT AND RECEIVING PARTY IN YOUR EMAIL.



Compliance Initials/Date

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Q22-28 Compliance Requirements Q27-28 Political Contributions (NEW)

Q29 TFG-Financial & TAG-Advisory

Q30-33 Email

Q34-35 Cyber Security Q36 Devices Q37 Cellphone Use Q38 Voicemail Disclosures Q39 Outside Business Activities Q40 U4 (<u>https://finpro.finra.org</u>) Q41-42 Personal Accounts

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Email

- YOUR Signature and Trustmont's disclosures are REQUIRED on all outgoing emails and should be the same for initiated emails, replies and forwards
- \checkmark BAE systems automatically adds the disclosure when you hit send
- If you are a non-registered branch your address CANNOT be listed in your email
- ✓ ALL Personal/Private information is to be sent using our SECURE portal



rustmor

- ✓ The SECURE portal needs to be set up by you, it
 CAN NOT be initiated by the client
 ✓ instructions on how a client can access an email
 - sent to them secure has been added to the

Trustmont website under Representative/Advisor Resources then Email

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	25. In the past 12 months, I have submitted the required gift logs quarterly via the Trustmont website (<u>www.trustmontgroup.com</u>).
2	26. In the past 12 months, I have not given any customer gifts that exceeded a value of \$100, nor have I received a gift from a customer that has a value exceeding \$100.
	27. I understand that I must complete the political contribution log located on the Trustmont website (<u>www.trustmontgroup.com</u>) or a quarterly basis detailing contributions made by me or any member of my household (including spouse, domestic partner, minor children, or other dependents residing in my home) ONLY if making contributions. I certify all contributions for the current year have been reported.
	28.1 understand that I must request approval for any political contributions over \$250, prior to making the contribution by notifying the compliance department in writing. I certify that all contributions over \$250 have been approved.
	29. During the last 12 months, I have reviewed Trustmont's written supervisory procedures and Trustmont's compliance manuals located on the Trustmont website (<u>www.trustmontgroup.com</u>). I acknowledge that I understand and intend to comply with all current policies and procedures outlined within. <u>Manuals reviewed</u> : <u>WSPs</u> <u>TFG</u> <u>TAG</u>
st	30. I only use my Trustmont approved email address for all securities-related communications and I understand that I may not publish an unapproved email on business correspondence or provide to clients.
î.	31.1 have included a signature on my outgoing emails to identify myself to clients and business associates.
i.	32.1 understand that I must notify Trustmont when I will be away from my office for an extended period of time and unable to respond to my clients in a timely manner. I understand that I must have an out-of-office reply placed on my email in such instances and maintain the proper voicemail message on my phone.
	33. I understand that when transmitting personal and private information via email that it is my responsibility to safeguard the information by utilizing the <u>SECURE</u> email system.
	34. I am familiar with Trustmont's Written Supervisory Procedures (WSP's) on protection of digital customer information and comply with its requirements in the event that I download, create, and/or maintain customer non-public personal information, such as social security numbers, accounts numbers, bank routing numbers, etc., on a desktop computer or portable device.
	35. In the past 12 months, I have reviewed, understand, complied with, and intend on continuing to comply with all current policies and procedures regarding Cyber Security and the protection of digital customer information. If changes to my cyber security have occurred, I agree to complete and return the certification form located on the Trustmont website (<u>www.trustmontgroup.com</u>).
	36.1 have notified Trustmont of any changes, additions, or discontinuations to my electronic devices by completing the certification form on the Trustmont website (<u>www.trustmontgroup.com</u>).
	37. I have disclosed to Trustmont the use of a cell phone in my securities business if applicable. I also certify that my cellphone voicemail has the proper disclosure as listed on the Trustmont website. PROVIDE cell phone#:
Ĩ	38.1 have the proper Trustmont voicemail disclosure message on the phone number(s) used in my securities business.
Č.	39. I have disclosed and received written approval for all outside business activities/private securities transactions. I retain a copy of the approval in my files. I am responsible for submitting any new ventures or changes for approval to be updated on my U4.
	40.1 certify that I have reviewed my U-4 on https://finpro.finra.org and all information contained therein is true and correct. I understand that I am solely responsible for verifying the accuracy and content of this information. I also understand that I have an ongoing responsibility to have my U4 amended when any of the information changes by reporting such changes to Trustmont.
	41.1 have notified Trustmont of all securities accounts (this includes Bitcoin/crypto currency) held by me personally or a member of my household and verified that confirmations and statements are being sent to the Trustmont Compliance Department. I am aware that I must obtain approval prior to opening any new outside brokerage accounts. I acknowledge that for all brokerage accounts held outside of Trustmont. I will be charged \$100 annual fee per account
	 42. In the past 12 months, I have received pre-clearance for all covered security transactions made by me or any member of my household in all of my/our personal accounts.

022 ARQ/Cyber Security/Ethics Policy/Holding:

t 4th Quarter 2022 Webinar

FINRA U4

*Enter User ID & Password *Once logged in you are looking at vour U4 *Review for accuracy, making sure to check location addresses listed, even in the OBA section *send us an email at <u>compliance@trustmontgroup.com</u> with any corrections, add ons, or changes that need made *it is **YOUR** responsibility to make sure all information is accurate *If you are experiencing any difficulties, please contact the Gateway Call Center at (240) 386-4040 for assistance.

FINCA

Log In Single Sign-On (SSO)

Welcome to Financial Professional Gateway

User ID

Enter User ID here (ex.: jdoe12)

Password

Enter password here

View Password

By clicking "Accept and continue" I certify that I have read, understood, and accepted the <u>Privacy Policy</u> and the FINRA <u>Entitlement Program Terms of Use</u>.

ACCEPT AND CONTINUE

Forgot User ID or Password?

Don't have an account? Create Account Here

4th Quarter 2022 Webinar

Page 2

Q22-28 Compliance Requirements Q27-28 Political Contributions (NEW) Q29 TFG-Financial & TAG-Advisory Q30-33 Email Q34-35 Cyber Security Q36 Devices Q37 Cellphone Use Q38 Voicemail Disclosures Q39 Outside Business Activities Q40 U4 (https://finpro.finra.org) Q41-42 Personal Accounts

	22. I have participated in or viewed the recording for all mandatory webinars for the current year. Check boxes for webinars attended or viewed: □IstQ □2ndQ □3rdQ □4thQ
	23. I have successfully completed or plan to complete before Dec 1, 2022 all modules for the 2022 Annual Compliance Meeting.
	24. In the past 12 months, I have submitted all the monthly logs required. This includes correspondence logs and check register logs via the Trustmont website (www.trustmontgroup.com).
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	26. In the past 12 months, I have not given any customer gifts that exceeded a value of \$100, nor have I received a gift from a customer that has a value exceeding \$100.
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	28. I understand that I must request approval for any political contributions over \$250, prior to making the contribution by notifying the compliance department in writing. I certify that all contributions over \$250 have been approved.
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	31. I have included a signature on my outgoing emails to identify myself to clients and business associates.
	32. I understand that I must notify Trustmont when I will be away from my office for an extended period of time and unable to respond to my clients in a timely manner. I understand that I must have an out-of-office reply placed on my email in such instances and maintain the proper voicemail message on my phone.
	33. I understand that when transmitting personal and private information via email that it is my responsibility to safeguard the information by utilizing the <u>SECURE</u> email system.
	34. I am familiar with Trustmont's Written Supervisory Procedures (WSP's) on protection of digital customer information and comply with its requirements in the event that I download, create, and/or maintain customer non-public personal information, such as social security numbers, accounts numbers, bank routing numbers, etc., on a desktop computer or portable device.
	35. In the past 12 months, I have reviewed, understand, complied with, and intend on continuing to comply with all current policies and procedures regarding Cyber Security and the protection of digital customer information. If changes to my cyber security have occurred, I agree to complete and return the certification form located on the Trustmont website (<u>www.trustmontgroup.com</u>).
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	37. I have disclosed to Trustmont the use of a cell phone in my securities business if applicable. I also certify that my cellphone voicemail has the proper disclosure as listed on the Trustmont website. PROVIDE cell phone#:
<u> </u>	38. I have the proper Trustmont voicemail disclosure message on the phone number(s) used in my securities business.
	39. I have disclosed and received written approval for all outside business activities/private securities transactions. I retain a copy of the approval in my files. I am responsible for submitting any new ventures or changes for approval to be updated on my U4.
	40. I certify that I have reviewed my U-4 on <u>https://finpro.finra.org</u> and all information contained therein is true and correct. I understand that I am solely responsible for verifying the accuracy and content of this information. I also understand that I have an ongoing responsibility to have my U4 amended when any of the information changes by reporting such changes to Trustmont.
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Page 3 Q43-45 Office Maintenance Q46 Discretionary Authority Q47 Professional Designations Q48 Shredding

Q49 Online meetings

Q50-CRM Q51 Importing Systems (NEW) Q52-Financial Planning Q53- Consolidated Reports

Office Maintenance 43. In the last 12 months, I have disclosed to Trustmont any changes in office personnel by completing the certification form on the Trustmont website (www.trustmontgroup.com) 44. I have and will continue to obtain prior written approval for all securities business-related advertising, sales or marketing materials, newspaper articles, radio or TV broadcasts, blogs, seminars, social media posts, etc. I understand that requests for approval are to be sent through the link on the Trustmont website (www.trustmontgroup.com) 14 days in advance of requested date of use. 45. Do you use any form of stationery in your business, ie: business card, letterhead, fax coversheet, printed envelope, brochure, etc. 🗌 Yes 📄 No If yes, have you received prior approval? 🗂 Yes 📄 No if yes, select which ones from the list below. (Note: if newly created this year provide a copy of all that apply) business card printed envelope letterhead brochure ☐ fax coversheet other (explain in box below) **Discretionary Authority** 46. Answer the following questions to the best of your ability, this DOES include family members (If you answer yes to any of the items below, list names/additional information for each on page 5) • Do you hold a power of attorney for any client? □ Yes □ No Do you serve as trustee for any client? □ Yes □ No Do you serve as executor for any client? TYes TNo Are you listed as a beneficiary on any client account whether held at Trustmont or away? 🗌 Yes 🗐 No Do you have signature authority over any account other than your own personal account? 🛛 Yes 🗖 No Professional Designations 47. Do you hold any professional designations? 🛛 Yes 🗋 No If yes, indicate which ones below; If you have acquired a new designation in the last 12 months provide copy of certificate with this questionnaire. E PFS CFP (new certification required yearly) CFA (new certification required yearly) E FPOP CPA (new certification required yearly) CMFC ChFC (new certification required yearly) MST LUTCF CIC CLU Attorney RICP other (list in box below) CRPC Shredding Services 48. Do you use a shredding service to dispose of clients' personal and private information in a secure manner to prevent unauthorized access to it? 🗖 Yes 🗖 No If yes, provide program used (if new or different this year then a copy of a current certificate of destruction is required) **Online** Meetings 49. Do you conduct online meetings with your clients? 🗌 Yes 🗖 No. If yes, provide program used Check here to certify that you received prior approval from Compliance prior to using said program or conducting meetings CRM (Client Records Management) Program (Note: If new this year provide copy of contract) 50. Do you use a CRM Program? 🗖 Yes 🗖 No 🛛 If yes, provide program used porting Software 51. Do you use Laserapp or any other form of importing software in your business when completing client paperwork/forms? Yes No If yes, provide program used Financial Planning Software (Note: If new this year provide copy of contract) 52. Do you use Financial Planning Software? 📋 Yes 🗌 No 🛛 If yes, provide program used Consolidated Reports 53. Do you provide consolidated reports to your clients? □ Yes □ No If yes, provide program used If self-prepared, check here that you understand that any and all consolidated reports created by a representative using programs such as adobe, excel, word, etc. must be approved prior to being given to your clients. Approved system generated reports (Portfolio Pathways, MorningStar, etc.) do not require prior approval, however you must provide Compliance with an electronic copy. These should be submitted at least monthly to reports@trustmontgroup.com



ONLINE MEETINGS

Microsoft Teams

As a reminder if you want to participate in online meetings you need to have prior approval from the Compliance Department *you will also need to submit a monthly log of all meetings including any handouts given or presentations



Page 3

Q43-45 Office Maintenance Q46 Discretionary Authority Q47 Professional Designations Q48 Shredding Q49 Online meetings Q50-CRM

Q51 Importing Systems (NEW)

Q52-Financial Planning Q53- Consolidated Reports

Office Maintenance 43. In the last 12 months, I have disclosed to Trustmont any changes in office personnel by completing the certification form on the Trustmont website (www.trustmontgroup.com) 44. I have and will continue to obtain prior written approval for all securities business-related advertising, sales or marketing materials, newspaper articles, radio or TV broadcasts, blogs, seminars, social media posts, etc. I understand that requests for approval are to be sent through the link on the Trustmont website (www.trustmontgroup.com) 14 days in advance of requested date of use. 45. Do you use any form of stationery in your business, ie: business card, letterhead, fax coversheet, printed envelope, brochure, etc. 🗌 Yes 📄 No If yes, have you received prior approval? 🗂 Yes 📄 No if yes, select which ones from the list below. (Note: if newly created this year provide a copy of all that apply) business card printed envelope letterhead brochure ☐ fax coversheet other (explain in box below) **Discretionary Authority** 46. Answer the following questions to the best of your ability, this DOES include family members (If you answer yes to any of the items below, list names/additional information for each on page 5) • Do you hold a power of attorney for any client? □ Yes □ No Do you serve as trustee for any client? □ Yes □ No Do you serve as executor for any client? TYes TNo Are you listed as a beneficiary on any client account whether held at Trustmont or away? 🗌 Yes 🗐 No Do you have signature authority over any account other than your own personal account? 🛛 Yes 🗖 No Professional Designations 47. Do you hold any professional designations? 🛛 Yes 🗋 No If yes, indicate which ones below; If you have acquired a new designation in the last 12 months provide copy of certificate with this questionnaire. E PFS CFP (new certification required yearly) CFA (new certification required yearly) E FPOP CPA (new certification required yearly) CMFC ChFC (new certification required yearly) MST LUTCF CIC CLU Attorney RICP other (list in box below) CRPC Shredding Services 48. Do you use a shredding service to dispose of clients' personal and private information in a secure manner to prevent unauthorized access to it? 🗖 Yes 🗖 No If yes, provide program used (if new or different this year then a copy of a current certificate of destruction is required) **Online** Meetings 49. Do you conduct online meetings with your clients? 🗌 Yes 🗖 No. If yes, provide program used Check here to certify that you received prior approval from Compliance prior to using said program or conducting meetings CRM (Client Records Management) Program (Note: If new this year provide copy of contract) 50. Do you use a CRM Program? 🗖 Yes 🗖 No 🛛 If yes, provide program used porting Software 51. Do you use Laserapp or any other form of importing software in your business when completing client paperwork/forms? Yes No If yes, provide program used Financial Planning Software (Note: If new this year provide copy of contract) 52. Do you use Financial Planning Software? 🔽 Yes 🔽 No 11 fyes, provide program used Consolidated Reports 53. Do you provide consolidated reports to your clients? □ Yes □ No If yes, provide program used If self-prepared, check here that you understand that any and all consolidated reports created by a representative using programs such as adobe, excel, word, etc. must be approved prior to being given to your clients. Approved system generated reports (Portfolio Pathways, MorningStar, etc.) do not require prior approval, however you must provide Compliance with an electronic copy. These should be submitted at least monthly to reports@trustmontgroup.com



Import Software

 Do you use an information import system such as LaserApp? ✓ Are your forms up-to-date? \checkmark Are you using the correct client data? Are you transmitting information securely?

4th Quarter 2022 Webinar

Page 3

Q43-45 Office Maintenance Q46 Discretionary Authority Q47 Professional Designations Q48 Shredding Q49 Online meetings Q50-CRM Q51 Importing Systems (NEW) Q52-Financial Planning

Q53- Consolidated Reports

44. I have and will continue to obtain prior written approval for all se materials, newspaper articles, radio or TV broadcasts, blogs, seminars, s are to be sent through the link on the Trustmont website (<u>www.trustr</u> 45. Do you use any form of stationery in your business, iet businers brochure, etc. □ Yes □ No If yes, have you received prior ap if yes, select which ones from the list below. (Note: if newly created □ business card □ letterhead □ fax coversheet Discretionary Authority 46. Answer the following questions to the best of your ability, this <u>DO</u> (If you answer yes to any of the items below, list names/additional inform • Do you hold a power of attorney for any client? □ Yes □ No • Do you serve as trustee for any client? □ Yes □ No	social media posts, etc. 1 understand that requests for appro montgroup.com) 14 days in advance of requested date of us ss card, letterhead, fax coversheet, printed envelope, pproval? [Yes No d this year provide a copy of all that apply] [printed envelope [brochure] other (explain in box below) DES include family members hatton for each on page 5] at Trustmont or away? [Yes No
are to be sent through the link on the Trustmont website (www.trustr 45. Do you use any form of stationery in your business, iei business brochure, etc. Yes No If yes, have you received prior ap if yes, select which ones from the list below. (Note: if newly created business card letterhead fax coversheet Discretionary Authority 46. Answer the following questions to the best of your ability, this DO (If you answer yes to any of the items below, list names/additional inform • Do you hold a power of attorney for any client? Yes No	montgroup.com) 14 days in advance of requested date of us ss card, letterhead, fax coversheet, printed envelope, pproval? [Yes No d this year provide a copy of all that apply) printed envelope brochure other (explain in box below) PES include family members nation for each on page 5) at Trustmont or away? [Yes No
 45. Do you use any form of stationery in your business, ie: business brochure, etc. Yes No If yes, have you received prior ap if yes, select which ones from the list below. (Note: if newly created business card letterhead fax coversheet Discretionary Authority 46. Answer the following questions to the best of your ability, this DO (If you answer yes to any of the items below, list names/additional inform Do you hold a power of attorney for any client? Yes No Do you serve as trustee for any client? Yes No 	ss card, letterhead, fax coversheet, printed envelope, pproval? [Yes No d this year provide a copy of all that apply) printed envelope brochure other (explain in box below) <u>DES</u> include family members hation for each on page 5) at Trustmont or away? Yes No
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Discretionary Authority 46. Answer the following questions to the best of your ability, this DO (If you answer yes to any of the items below, list names/additional inform • Do you hold a power of attorney for any client? Yes • Do you serve as trustee for any client? Yes • Do you serve as trustee for any client? Yes	DES include family members nation for each on page 5) at Trustmont or away?
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(If you answer yes to any of the items below, list names/additional inform • Do you hold a power of attorney for any client? □ Yes □ No • Do you serve as trustee for any client? □ Yes □ No	attion for each on page 5) at Trustmont or away? 🗌 Yes 🗖 No
Do you hold a power of attorney for any client? □ Yes □ No Do you serve as trustee for any client? □ Yes □ No	at Trustmont or away? 🗌 Yes 📮 No
 Do you serve as trustee for any client? □ Yes □ No 	
 Do you serve as executor for any client: in the rest in two Are you listed as a beneficiary on any client account whether held a 	
 Do you have signature authority over any account other than your 	own personal account? L Yes L No
Professional Designations	
47. Do you hold any professional designations? Types No If ye	es, indicate which ones below; If you have acquired a
new designation in the last 12 months provide copy of certificate with this	
CFP (new certification required yearly)	PFS
CFA (new certification required yearly)	FPOP
CPA (new certification required yearly)	
ChFC (new certification required yearly)	MST
LUTCF	
CLU CLU	Attorney
C RICP	other (list in box below)
CRPC	
Shredding Services	
48. Do you use a shredding service to dispose of clients' personal and	private information in a secure manner to prevent
unauthorized access to it?	
(if new or different this year then a copy of a current certificate of destruct	tion is required)
Online Meetings	
49. Do you conduct online meetings with your clients? 🗍 Yes 🗖 N	No If yes, provide program used
Check here to certify that you received prior approval from Complian	nce prior to using said program or conducting meetings
CRM (Client Records Management) Program (Note: If new this year provide	copy of contract)
50. Do you use a CRM Program? 🗖 Yes 🗌 No 🛛 If yes, provide	program used
Importing Software	
51. Do you use Laserapp or any other form of importing software i	in your business when completing client paperwork/forn
□ Yes □ No If yes, provide program used	
Financial Planning Software (Note: If new this year provide copy of contract	t)
52. Do you use Financial Planning Software? 🔲 Yes 🗌 No Ify	ves, provide program used
Consolidated Reports	
53. Do you provide consolidated reports to your clients? TYes	
If self-prepared, check here that you understand that any and programs such as adobe, excel, word, etc. must be approved prior to being	
(Portfolio Pathways, MorningStar, etc.) do not require prior approval, how	



REPORTS



As a reminder if you are providing consolidated reports from Portfolio Pathways, copies of those need to be submitted on a monthly basis *they should be emailed to <u>reports@trustmontgroup.com</u> *any self-created report/letter needs prior approval before giving to the client



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Notes:

Q54 shared office space (refers to sharing office space with a representative that is registered with another broker-dealer or registered investment advisor.

Q55 outside financial/business relationships

Q56 address changes

Q57 401k plans (refers to accounts you manage or that you're the rep of record) Q58-Social Media

54. Do you share any form of office space with any individual or entity not registered with Trustmont but who is registered with another broker-dealer or RIA? 🗌 Yes 🔲 No 🛛 If yes, provide names in box below. 55. Do you have any financial or business relationships outside of your activities associated with Trustmont? 🗖 Yes 🗌 No If yes, provide names in box below. If yes, are Trustmont clients involved? 🗌 Yes 🗌 No 56. Did you make any residential and/or business address changes you made within the past 12 months? 🗌 Yes 📋 No If yes, provide month it took place as well as the full address(es) in the box below, indicate if it was residential and/or business. (If more space is required list on page 5) 57. Do you manage or are listed as the rep of record on any 401k plans? 🗖 Yes 🗍 No If yes, list plans under management in the box below. (If more space is required list on page 5) 58. SOCIAL MEDIA •Do you have any social media sites, whether you use them for business and/or personal purposes? 🗌 Yes 🔲 No If yes, list in the box below and indicate if personal and/or business, this would include sites such as LinkedIn, Facebook, Twitter, Instagram, business websites, etc. (If more space is required list on page 5) Have you used any social media site (e.g., Facebook, Twitter, LinkedIn, blog, or electronic bulletin board) or text. messaging service to engage in any conversations pertaining to the business of Trustmont? TYes TNo If you cannot certify the truth and accuracy of any item listed within the questionnaire, attach a detailed written explanation. I verify that the statements made in this certification are true and correct. I understand that false statements herein are made subject to the criminal penalties of 18Pa.C.S. 4904 related to unsworn falsification. Printed Rep Name Signature Date 2022 ARQ/Cyber Security/Ethics Policy/Holdings



Please use this page if you need additional space to answer any of the questions on the 2022 annual questionnaire

Question # Details

2022 Annual Representative Questionnaire

Page 5

This page is used when additional information is needed for prior questions



Page 6

This page is new this year and will be used to help us gather necessary information about your cyber security protocols should a security breach occur.

*We have also updated the Certification of Electronic Device and Cyber Security Form to include an attestation that customers' sensitive information has been wiped clean from a retired device. The new form is on the Trustmont website.

W Ton	istmont
III	18011011
	Group

Certification of Cyber Security on Electronic Devices

To ensure that our customer's non-public information is protected from any potential cyber-crimes, the firm has implemented the policies and procedures addressing the protection of Digital Customer Information that are located in section 39 of the WSP's.

Device #1: Is your computer and device used for your securities business protected with up-to-date antivirus software, firewall software, and antimalware software? Yes No (Note: you could be asked at any time to provide documentation of the software used)

Are your computers and devices log-in privileges protected by a strong password that is frequently changed? Yes

Do all of your devices "time out" after 15 minutes or less of non-use?

Do all of your devices have Software auto-update set to "ON"? Yes No

Device Description (example: "primary office computer) Include desktops, laptops, tablets and other devices	Device Type (example: iMac, Dell, HP, Acer, Lenovo, Asus, ThinkPad, Surface, etc.)	Operating System Used	Anti-Virus Software	Firewall Software	Anti-Malware Software
	0				

Device #2: is your computer and device used for your securities business protected with up-to-date antivirus software, firewall software, and antimalware software? Yes No (Note: you could be asked at any time to provide documentation of the software used)

Are your computers and devices log-in privileges protected by a strong password that is frequently changed? Yes

Do all of your devices "time out" after 15 minutes or less of non-use? Yes No

Do all of your devices have Software auto-update set to "ON"? Yes No

Device Description (example: "primary office computer) Include desktops, laptops, tablets and other devices	Device Type (example: iMac, Dell, HP, Acer, Lenovo, Asus, ThinkPad, Surface, etc.)	Operating System Used	Anti-Virus Software	Firewall Software	Anti-Malware <mark>So</mark> ftware
	10 of 11 of 2	e 14			

Device #3: Is your computer and device used for your securities business protected with up-to-date antivirus software, firewall software, and antimalware software? Yes No (Note: you could be asked at any time to provide documentation of the software used)

Are your computers and devices log-in privileges protected by a strong password that is frequently changed? Yes

Do all of your devices "time out" after 15 minutes or less of non-use?		Yes		No	
	_		<u> </u>		

Do all of your devices have Software auto-update set to "ON"? Yes No

Device Description (example: "primary office computer) Include desktops, laptops, tablets and other devices	Device Type (example: iMac, Dell, HP, Acer, Lenovo, Asus, ThinkPad, Surface, etc.)	Operating System Used	Anti-Virus Software	Firewall Software	Anti-Malware Software
			n 10 - 11 - 11 - 11		

If you cannot certiny the truth and accuracy or any item instea above, please attach a becared written explanation. I verify that the statements made in this certification are true and correct. I understand that false statements herein are made subject to the criminal penalties of 18Pa. C.S. 4909 relating to unsworn falsification.

Registered Representative's Signature/Date

2022 ARQ/Cyber Security/Ethics Policy/Holding

Trustmont Group **4th Quarter 2022 Webinar**

Cyber Security

Whenever a security incident is suspected or confirmed, notify Compliance immediately For example:

1. Malware is discovered on one or more devices

2. An unauthorized user breached your network

3. Fraudulent emails received allegedly from customers seeking to direct transfers of customer funds of securities.

4. Your office was the subject of an extortion attempt by an individual or group threatening to impair access to or damage the Firm's data, devices, or network.

5. An electronic device, such as laptop, CD-ROM, thumb drive, containing Customer Information has been lost or stolen.

6. Should you become aware that either their username or password of the system maintaining customer Information has been exposed to any unrelated and/or unauthorized party

7. You suspect or become aware that customer's non-public information has been breached, lost, or stolen by an unauthorized party

8. An employee engaged in misconduct that resulted in customer's information put at risk.





2022 Annual Representative Questionnaire additional pages



Ethics Policy This Ethics Policy is for all employees, registered representatives and advisors of Trustmont Financial Group, Inc. (TFG) and Trustmont Advisory Group. Inc. (TAG). This policy is a guide to ethical practices in working with clients the public This Ethics Policy is for all employees, registered representatives and advisors of Trustmont Financial Group, Inc. (T Trustmont Advisory Group, Inc. (TAG). This policy is a guide to ethical practices in working with clients, the public, correspondents. Mutual Fund and Insurance Companies It is TFG's and TAG's policy to conduct its business in full compliance with both the letter and the spirit of the securities and other laws and regulations. This policy includes dealine fairly and honestly with all customers, makine full disclosures of all It is TFG's and TAG's policy to conduct its business in full compliance with both the letter and the spirit of the securities and other laws and regulations. This policy includes dealing fairly and honestly with all customers, making full disclosures of all material facts in connection with securities transactions and obtaining sufficient customer information to determine that a other laws and regulations. This policy includes dealing fairly and honestly with all customers, making full disclosures of all material facts in connection with securities transactions, and obtaining sufficient customer information to determine that all service transactions are suitable for the customer. Each repietered representative and advisor has both a legal and business. יוטטווטוו אטווטע א טעטוט א פעטוט א פעטוט געוועטוי. נעראן אוועטווע איז א פעטט correspondents, Mutual Fund and Insurance Companies.

material facts in connection with securities transactions, and obtaining sufficient customer information to determine that all securities transactions are suitable for the customer. Each registered representative and advisor has both a legal and business obligation to comply with all applicable laws and regulations. To meet these objectives, each registered representative and securities transactions are suitable for the customer. Each registered representative and advisor has both a legal and busines obligation to comply with all applicable laws and regulations. To meet these objectives, each registered representative and advisor should be fully informed and knowledgeable about the ceruitities laws and regulations and must certify his or her obligation to comply with all applicable laws and regulations. To meet these objectives, each registered representative and advisor should be fully informed and knowledgeable about the securities laws and regulations and must certify his or her understanding of those matters prior to any sales activity, and periodically thereafter, as part of an ongoing compliance advisor should be fully informed and knowledgeable about the securities laws and regulations and must certify his or her understanding of those matters prior to any sales activity, and periodically thereafter, as part of an ongoing compliance program. TFG and TAG fully expect its registered representatives and advisors to exercise the highest degree of profession understanding of those matters prior to any sales activity, and periodically thereafter, as part of an ongoing compliance program. TFG and TAG fully expect its registered representatives and advisors to exercise the highest degree of professional ethics in all actions they undertake on behalf of the firm(c). In furtherance of that objective. TFG and TAG expect its registered Program. TFG and TAG fully expect its registered representatives and advisors to exercise the highest degree of professional ethics in all actions they undertake on behalf of the firm(s). In furtherance of that objective, TFG and TAG expect its registered representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and advisors to exercise the highest degree of the professional representatives and event degree of the professional represent ethics in all actions they undertake on behalf of the firm(s). In furtherance of that objective, FFG representatives and advisors to act in accordance with the policies set forth herein at all times.



I realize that under SEC and FINRA guidelines, I must disclose any and all of my personal securities accounts and those of my immediate family members within my household to my broker/dealer, whether or not these accounts are held at Trustmont Group or another brokerage and/or I realize that under SEC and FINRA guidelines, I must disclose any and all of my personal securities accounts and those of my immediate family members within my household to my broker/dealer, whether or not these accounts are held at Trustmont Group or another brokerage and/or investment advisory firm. By cloning the 3210 letter release. I understand that Trustmont will send a request to receive dunlicate statements are members within my household to my broker/dealer, whether or not these accounts are held at Trustmont Group Or another brokerage and/or investment advisory firm. By signing the 3210 letter release, I understand that Trustmont will send a request to receive duplicate statements and routeride accounts. If the outside brokerage and/or investment advisory firm refuses to provide duplicate statements and or investment advisory firm refuses to provide duplicate statements and or investment advisory firm refuses to provide duplicate statements and or investment advisory firm refuses to provide duplicate it will he my investment advisory firm. By signing the 3210 letter release, I understand that Trustmont will send a request to receive duplicate statements and confirmations on any and all outside accounts. If the outside brokerage and/or investment advisory firm refuses to provide duplicate statements and certifications of a counterful basis and certifications and all transactions. I understand that I must receive approval reconnectivity to provide them to Trustmont on a counterful basis and certifications and all transactions. I understand that I must receive approval confirmations on any and all outside accounts. If the outside brokerage and/or investment advisory firm refuses to provide duplicates it will be responsibility to provide them to Trustmont on a quarterly basis and certify any and all transactions. I understand that I must receive approval from Trustmont hefore any brokerage accounts may be opened in the future by completing the form located on the Trustmont website. responsibility to provide them to Trustmont on a quarterly basis and certify any and all transactions. I understand that I must receive approve from Trustmont before any brokerage accounts may be opened in the future by completing the form located on the Trustmont website. I understand that I may be charged a \$255/nuarter fee per account for those that are beld outside of Trustmont Group from Trustmont before any proverage accounts may be opened in the ruture by completing the form located on the understand that I may be charged a \$25/quarter fee per account for those that are held outside of Trustmont Group. Below is a list of personal accounts that we have on file for your household as of today, including direct mutual fund accounts, 401k accounts brokerage accounts, etc. Please review, add, delete, and make corrections as necessary. If you have added any new accounts in the last 12 mo Below is a list of personal accounts that we have on file for your household as of today, including direct mutual fund accounts, 401k accounts, brokerage accounts, etc. Please review, add, delete, and make corrections as necessary. If you have added any new accounts, 401k accounts, blaase attach a coov of the most recent statement for those accounts. If an account below is highlighted in vellow you are required to submit the Number Account Type of Owner Type of Investments Account (MF, ETF, Stock, Self

Ethics Policy (pages 7-8)

This is the same Ethics policy that you signed in previous years, no changes have been made

<u>Certification of Holdings (page 9)</u>

Each rep will receive as page 8 an individualized form with a list of all the personal accounts in your household that we have on record. Please review the accuracy, make corrections if needed, sign and return with the rest of the questionnaire *ALL ACCOUNTS IN YOUR HOUSEHOLD NEED TO BE INCLUDED



UITs, VA, Other)

Directed? Yes or No

Trustmont Website Tour

www.trustmontgroup.com

2	Trustmont Group	HOME ABOUT US NEWS RESOURCES CONTACT US
► C R	orms Library ompliance equirements epresentative /	Trustmont Group News Mandatory Webinar Registration Links: November 10, 2022 - https://attendee.gotowebinar.com/register/8141246305922814991
► P ► Jo	dvisor Resources olicies & Procedures oin Trustmont Group	Industry News A Timely Reminder Of Why You Take Stock Risk The equity risk premium, a concept in modern financial theory illustrated here, quantifies the premium stocks annually averaged in the 20 years ended September 31, 2022. Good And Bad Financial News: Weekly Investment Update The good news is that the Federal Reserve's preferred measure of inflation may be bottoming, but the bad news is the American consumer's purchasing power declined by -4.8% in the 12 months ended August 31. A Reminder About Market Timing And Stocks Everyone says trying to get in and out of the stock market is unwise, but this bar chart makes clear why. Market Snapshot
		Enter symbol GET QUOTE

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THANK YOU FOR ATTENDING AND HAPPY THANKSGIVING FROM **ALL OF US AT TRUSTMONT!**