



# Trustmont Group

November 11, 2021  
4<sup>th</sup> Quarter Mandatory Webinar  
End of the Year Wrap-up



4th Quarter 2021 Webinar

End of the Year Wrap-up

# COMPLIANCE      REMINDERS

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

\*All new business, checks, updates and paperwork related to client files should be sent to Audrey in our Operations Department



# Trustmont Website

www.trustmontgroup.com

## How to find compliance forms...

### ► Forms Library

### Potentially Required Forms

### ▼ Compliance

#### Requirements

[Request for Approval of Public Communications >>](#)

[Request for Approval of Position of Trust or Beneficiary >>](#)

[Request for Outside Account >>](#)

[Pre-Clearance Request Form >>](#)

[Check Register >>](#)

[Correspondence Report >>](#)

[Gift & Security Log >>](#)

[Potentially Required Forms >>](#)

[Office Requirements >>](#)

### ► Representative /

#### Advisor Resources

### ► Policies &

#### Procedures

### ► Join Trustmont

#### Group

LOG OUT

MOST forms below need pre-approval, email completed forms from this section to [compliance@trustmont.com](mailto:compliance@trustmont.com) 724-468-5675, or mail to the home office attention compliance department.

- **Cash & Non-Cash Compensation Log**  
Required when you wish to attend a meeting, seminar, training that will be paid for by a third-party product (including travel expenses, meals, lodging, prizes, awards, etc). Also required if/when a third party pays, in w educational meeting, seminar, event you host. Payments must be pre-approved and recorded in this log. Plt Representatives may NOT receive any cash compensation directly from outside firms or persons.
- **Intent to Use Social Media Sites**  
Required for making a change to any already approved social media or when you want to use any new socia personal use. You must receive approval prior to using.
- **Outside Business Activities**  
Upon being hired by Trustmont, you were required to disclose all outside business activities for which you a principal, president, partner, etc, as well as other entities you are employed by or doing business as. This in you receive compensation for (nonprofits, board appointments, rental properties, notary public, etc). After y this information, additional outside business activities or any change in existing outside business activities a pre-approval from Compliance. See FINRA rule 3270 for more information.
- **Private Securities Transactions**  
Registered individual are strictly prohibited from engaging in private securities transactions (any transaction approved by an authorized principal of this broker-dealer) without pre-approval.
- **Political Contributions Quarterly Log**  
Required quarterly for all reps that are making political contributions to any government entity, official, or c but is not limited to state representatives, school board candidates, political action committees, presidentialia should be emailed to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) or faxed directly to Trustmont on no less than a qu and registered representatives **MUST** have all political contributions of \$250 or more per individual per elect firm's compliance department prior to making the donation. These requests should be emailed to compliar with the subject line of "political contribution for approval". Please include the amount and receiving party i any other details.
- **Cyber Security & Electronic Device Disclosure**  
Required if you make a change to your cyber security or electronic devices within your office.
- **Certification of Outside Brokerage Account**  
Required quarterly for any outside personal account in which the custodian does not provide statements dli
- **Personnel Disclosure**  
Required to disclose all office personnel/staff members and if/when employment is terminated
- **Negative Response Letter (on Trustmont letterhead)**  
To be mailed to your client with a copy of most recent CPF when completing a 36-month update if in person the letter and accompanying CPF should be submitted to the operations department just as you would a ne response to the letter should also be submitted to operations.
- **Negative Response Letter (without Trustmont letterhead - to be put on your own PREAPPROVED letterhead must use other letter)**  
To be mailed to you client with a copy of most recent CPF when completing a 36-month update if in person i the letter and accompanying CPF should be submitted to the operations department just as you would a ne response to the letter should also be submitted to operations.

## How to find webinar recordings...

### ► Forms Library

### Trustmont Video Library

### ► Compliance

#### Requirements

### ▼ Representative /

#### Advisor Resources

[Who to Call at Trustmont? >>](#)

[Approved Direct Products >>](#)

[Approved Marketing Organizations & Indexed Annuities >>](#)

[Approved States >>](#)

[E&O Policy >>](#)

[Email >>](#)

[Jpass Comission Statements >>](#)

[Links to Affiliate Sites >>](#)

[Managed Account Platform Materials >>](#)

[Office Reccommendations >>](#)

[Portfolio Pathways >>](#)

[Trustmont Video Library >>](#)

[408\(b\)\(2\) >>](#)

### ► Policies &

#### 2021 Compliance Webinars

[8-12-2021 3rd Quarter Mandatory Webinar \(Staying the course thro](#)

[5-13-2021 2nd Quarter Mandatory Webinar \(Mid-Year Check-in & I](#)

[2-18-2021 1st Quarter Mandatory Webinar \(Goodby 2020, Hello 20](#)

#### 2020 Compliance Webinars

[11-12-2020 4th Quarter Mandatory Webinar \(End of the year wrap](#)

[8-13-2020 3rd Quarter Mandatory Webinar \(Industry News & Train](#)

[6-25-2020 2nd Quarter Mandatory Webinar \(Regulation Best Inter](#)

[2-13-2020 1st Quarter Mandatory Webinar \(Start the new year on t](#)

#### 2019 National Conference - Videos

[Welcome & President's message](#)

[Peter Dochinez, State of the Industry](#)

[Brad Kasper \(LSA Portfolio Analytics\), Managed Portfolios](#)

[Mike Ingenito \(Retirement Plan Advisory Services\), Regulation BI](#)

[Jim Renitsky \(Blackrock\), Building Your Business for the Future](#)

[Compliance & Operations Part 1](#)

[Compliance & Operations Part 2](#)

#### 2019 Compliance Webinars

[11-14-2019 November Webinar: Inverse & Leveraged ETF's \(Firm El](#)

[10-10-2019 October Webinar: Conference Follow Up & Industry Ne](#)

[8-8-2019 3rd Quarter Mandatory Webinar](#)

[5-9-2019 2nd Quarter Mandatory Webinar](#)

[2-14-2019 1st Quarter Mandatory Webinar](#)

#### 2018 Compliance Webinars



## 4th Quarter 2021 Webinar

End of the Year Wrap-up

## 2021 Annual Representative Questionnaire



A secure email went out to every representative/advisor at the beginning of November that included the questionnaire itself with the ethics policy (7 pages) and an individualized certification of holdings form (1 page).

This will be due by **11/22/2021**



4th Quarter 2021 Webinar

End of the Year Wrap-up

# 2021 Annual Representative Questionnaire

Page 1

Notes:

Rep#

DBA

Q1-check box

Q13-manuals TFG-Financial &

TAG-Advisory

Q14-Shredding

Q15 SECURE EMAIL

Q17-U4 (<https://finpro.finra.org>)

Q18-Outside Business Activities



## 2021 Annual Questionnaire and Conflicts of Interest Disclosure including Ethics Policy

Rep Name  Rep#  DBA (if applies)

Please **read** and **initial** in each box to certify understanding and compliance. Please note, this form will be rejected should it not be properly initialed and completed. **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 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.
- 2. In the past 12 months, I have not engaged in any sales activity in any State in which I am not licensed. I understand that I am solely responsible for ensuring that I am appropriately licensed.
- 3. In the past 12 months, I have provided a Privacy Disclosure Statement, CIP Notice and Business Continuity Plan to each new prospective client.
- 4. 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 and 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.
- 5. 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.
- 6. During the last 12 months, I have not been in receipt of any material nonpublic information about any publicly-traded company. I understand that I am not permitted to trade on nonpublic information.
- 7. 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 not taken possession of a customer security.
- 8. 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)
- 9. I advise customers of the availability of mutual fund breakpoints.
- 10. I do not promise or guarantee performance of any transaction(s).
- 11. I do not share commissions or fees with any unregistered entity, individual, or client/customer.
- 12. I understand that the Trustmont E&O policy only covers products and services sold through Trustmont.
- 13. During the last 12 months, I have reviewed Trustmont's Written Supervisory Procedures ("WSP") manuals located on the Trustmont website ([www.trustmontgroup.com](http://www.trustmontgroup.com)). I acknowledge that I understand and intend to comply with all current policies and procedures outlined within. **Manuals reviewed:**  TFG  TAG
- 14. I certify that I maintain my clients' personal and private information in a secure manner to prevent unauthorized access to it, and then properly dispose of sensitive information when retention is no longer necessary. I use the following shredding service in my business \_\_\_\_\_ (if none write N/A on the line)
- 15. I understand that when transmitting personal and private information via email that it is my responsibility to safeguard the information by utilizing the **SECURE** email system.
- 16. 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.
- 17. I 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 amend my U4 when any of the information changes by reporting such changes to Trustmont.
- 18. 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 reporting any new ventures or changes that require approval and updating my U4.



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# MANUALS

- ▶ Forms Library
- ▶ Compliance Requirements
- ▶ Representative / Advisor Resources
- ▼ Policies & Procedures

[Trustmont Written Supervisory Procedures >>](#)

★ [Trustmont Advisory Procedure Manual >>](#)

★ [Registered Reps Manual >>](#)  
[Internal Use Only >>](#)

▶ [Join Trustmont Group](#)

[Click to open](#)

[LOG OUT](#)

## Trustmont Group News

### Industry News

[S&P 500 Closed Friday At Record High Again On Strong Earnings Reports](#)

Despite some bad economic news this past week, the Standard & Poor's 500 stock index closed today at a record high stronger-than-expected earnings reports.

[With Economic Recovery Intact, Stocks Are Near Record Again](#)

Despite the Delta variant, inflation fears, and supply chain disruptions, and uncertainty in Washington on spending policies, the economic recovery from the pandemic meltdown remains intact.

[An In-Depth Report For Investors On Key Economic Fundamentals](#)

Supply chain problems, often cited in the media as the main cause of inflation, are expected to diminish greatly by the end of the year. The high inflation rate on goods is expected to revert to the normal 2% rate experienced for the decade preceding the pandemic by the end of 2022, and prices on some goods may even be rolled back to pre-pandemic levels. For example, lumber prices at Home Depot soared in the Spring of 2021 but reverted to pre-pandemic levels by early Fall.

## Market Snapshot



**4th Quarter 2021 Webinar**

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3. In the past 12 months, I have provided a Privacy Disclosure Statement, CIP Notice and Business Continuity Plan to each new prospective client.
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5. 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.
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Page 1 of 7 2021 ARQ/Ethics Policy



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# SECURE



# EMAIL

## BAE SYSTEMS

Type **Secure:** FIRST in the Subject line

Send	From ▾	mjh@trustmontgroup.com
	To...	ach@trustmontgroup.com;
	Cc...	
	Subject:	Secure: Client info

## erado

Type **Secureit** anywhere in the body of the message



200 Brush Run Road  
Greensburg, PA 15601  
[www.trustmontgroup.com](http://www.trustmontgroup.com)  
724-468-5665

Secureit

This communication may contain privileged and/or confidential information. If you received this communication in error, please contact the sender immediately. The information contained in this e-mail is not warranted as to completeness.

**\*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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# U4

- \*Enter User ID & Password
- \*Once logged in you are looking at your U4
  - \*click print my report
  - \*Review for accuracy
  - \*email [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) 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.

FINRA

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 [Privacy Policy](#) and the FINRA [Entitlement Program Terms of Use](#).

ACCEPT AND CONTINUE

[Forgot User ID or Password?](#)

• Don't have an account? [Create Account Here](#)



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- **Cash & Non-Cash Compensation Log**  
Required when you wish to attend a meeting, seminar, training that will be paid for by a third-party product sponsor or provider (including travel expenses, meals, lodging, prizes, awards, etc). Also required if/when a third party pays, in whole or in part, for an educational meeting, seminar, event you host. Payments must be pre-approved and recorded in this log. Please note: Registered Representatives may NOT receive any cash compensation directly from outside firms or persons.
- **Intent to Use Social Media Sites**  
Required for making a change to any already approved social media or when you want to use any new social media for business or personal use. You must receive approval prior to using.
- ★ **Outside Business Activities**  
Upon being hired by Trustmont, you were required to disclose all outside business activities for which you are an owner, officer, principal, president, partner, etc. as well as other entities you are employed by or doing business as. This includes outside activities you receive compensation for (nonprofits, board appointments, rental properties, notary public, etc). After your initial disclosure of this information, additional outside business activities or any change in existing outside business activities are **NOT** permitted without pre-approval from Compliance. See FINRA rule 3270 for more information.
- **Private Securities Transactions**  
Registered individual are strictly prohibited from engaging in private securities transactions (any transaction not sponsored or approved by an authorized principal of this broker-dealer) without pre-approval.
- **Political Contributions Quarterly Log**  
Required quarterly for all reps that are making political contributions to any government entity, official, or candidate. This includes but is not limited to state representatives, school board candidates, political action committees, presidential campaigns, etc. Form should be emailed to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) or faxed directly to Trustmont on no less than a quarterly basis. 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](mailto:compliance@trustmontgroup.com) with the subject line of "political contribution for approval". Please include the amount and receiving party in your email along with any other details.
- **Cyber Security & Electronic Device Disclosure**  
Required if you make a change to your cyber security or electronic devices within your office.
- **Certification of Outside Brokerage Account**  
Required quarterly for any outside personal account in which the custodian does not provide statements directly to the home office.
- **Personnel Disclosure**  
Required to disclose all office personnel/staff members and if/when employment is terminated
- **Negative Response Letter (on Trustmont letterhead)**  
To be mailed to your client with a copy of most recent CPF when completing a 36-month update if in person is not possible. A copy of the letter and accompanying CPF should be submitted to the operations department just as you would a new/updated CPF, any client response to the letter should also be submitted to operations.
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Q19-Outside Personal Accounts

Q20-Pre-clearances

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Q24-Webinars

Q26 & 34-Devices & Cyber Security

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mass mail date: 6-12-2020

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- Office Requirements >>

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► Policies & Procedures

► Join Trustmont Group

LOG OUT

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- **Cash & Non-Cash Compensation Log**  
Required when you wish to attend a meeting, seminar, training that will be paid for by a third-party product sponsor or provider (including travel expenses, meals, lodging, prizes, awards, etc). Also required if/when a third party pays, in whole or in part, for an educational meeting, seminar, event you host. Payments must be pre-approved and recorded in this log. Please note: Registered Representatives may NOT receive any cash compensation directly from outside firms or persons.
- **Intent to Use Social Media Sites**  
Required for making a change to any already approved social media or when you want to use any new social media for business or personal use. You must receive approval prior to using.
- **Outside Business Activities**  
Upon being hired by Trustmont, you were required to disclose all outside business activities for which you are an owner, officer, principal, president, partner, etc. as well as other entities you are employed by or doing business as. This includes outside activities you receive compensation for (nonprofits, board appointments, rental properties, notary public, etc). After your initial disclosure of this information, additional outside business activities or any change in existing outside business activities are **NOT** permitted without pre-approval from Compliance. See FINRA rule 3270 for more information.
- **Private Securities Transactions**  
Registered individual are strictly prohibited from engaging in private securities transactions (any transaction not sponsored or approved by an authorized principal of this broker-dealer) without pre-approval.
- **Political Contributions Quarterly Log**  
Required quarterly for all reps that are making political contributions to any government entity, official, or candidate. This includes but is not limited to state representatives, school board candidates, political action committees, presidential campaigns, etc. Form should be emailed to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) or faxed directly to Trustmont on no less than a quarterly basis. 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](mailto:compliance@trustmontgroup.com) with the subject line of "political contribution for approval". Please include the amount and receiving party in your email along with any other details.
- **Cyber Security & Electronic Device Disclosure**  
Required if you make a change to your cyber security or electronic devices within your office.
- **Certification of Outside Brokerage Account**  
Required quarterly for any outside personal account in which the custodian does not provide statements directly to the home office.
- **Personnel Disclosure**  
Required to disclose all office personnel/staff members and if/when employment is terminated
- **Negative Response Letter (on Trustmont letterhead)**  
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- **Intent to Use Social Media Sites**  
Required for making a change to any already approved social media or when you want to use any new social media for business or personal use. You must receive approval prior to using.
- **Outside Business Activities**  
Upon being hired by Trustmont, you were required to disclose all outside business activities for which you are an owner, officer, principal, president, partner, etc. as well as other entities you are employed by or doing business as. This includes outside activities you receive compensation for (nonprofits, board appointments, rental properties, notary public, etc). After your initial disclosure of this information, additional outside business activities or any change in existing outside business activities are **NOT** permitted without pre-approval from Compliance. See FINRA rule 3270 for more information.
- **Private Securities Transactions**  
Registered individual are strictly prohibited from engaging in private securities transactions (any transaction not sponsored or approved by an authorized principal of this broker-dealer) without pre-approval.
- **Political Contributions Quarterly Log**  
Required quarterly for all reps that are making political contributions to any government entity, official, or candidate. This includes but is not limited to state representatives, school board candidates, political action committees, presidential campaigns, etc. Form should be emailed to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) or faxed directly to Trustmont on no less than a quarterly basis. 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](mailto:compliance@trustmontgroup.com) with the subject line of "political contribution for approval". Please include the amount and receiving party in your email along with any other details.
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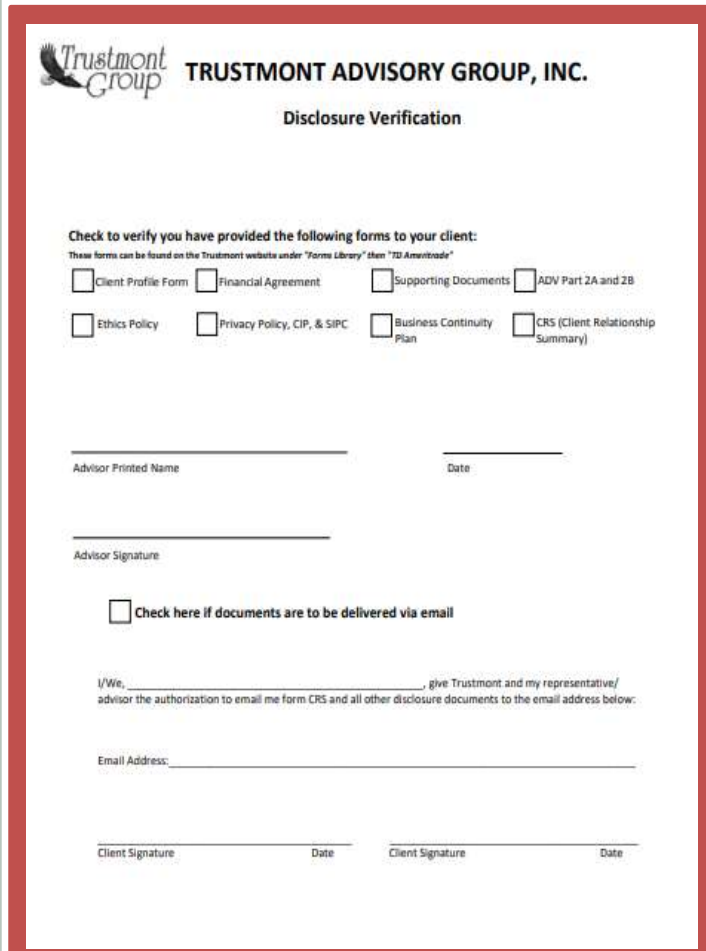
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# Regulation Best Interest



**Trustmont Group** TRUSTMONT ADVISORY GROUP, INC.  
Disclosure Verification

Check to verify you have provided the following forms to your client:  
These forms can be found on the Trustmont website under "Forms Library" then "2D Ameritrade"

Client Profile Form  Financial Agreement  Supporting Documents  ADV Part 2A and 2B  
 Ethics Policy  Privacy Policy, CIP, & SIPC  Business Continuity Plan  CRS (Client Relationship Summary)

\_\_\_\_\_  
Advisor Printed Name Date

\_\_\_\_\_  
Advisor Signature

Check here if documents are to be delivered via email

I/We, \_\_\_\_\_, give Trustmont and my representative/ advisor the authorization to email me form CRS and all other disclosure documents to the email address below:

Email Address: \_\_\_\_\_

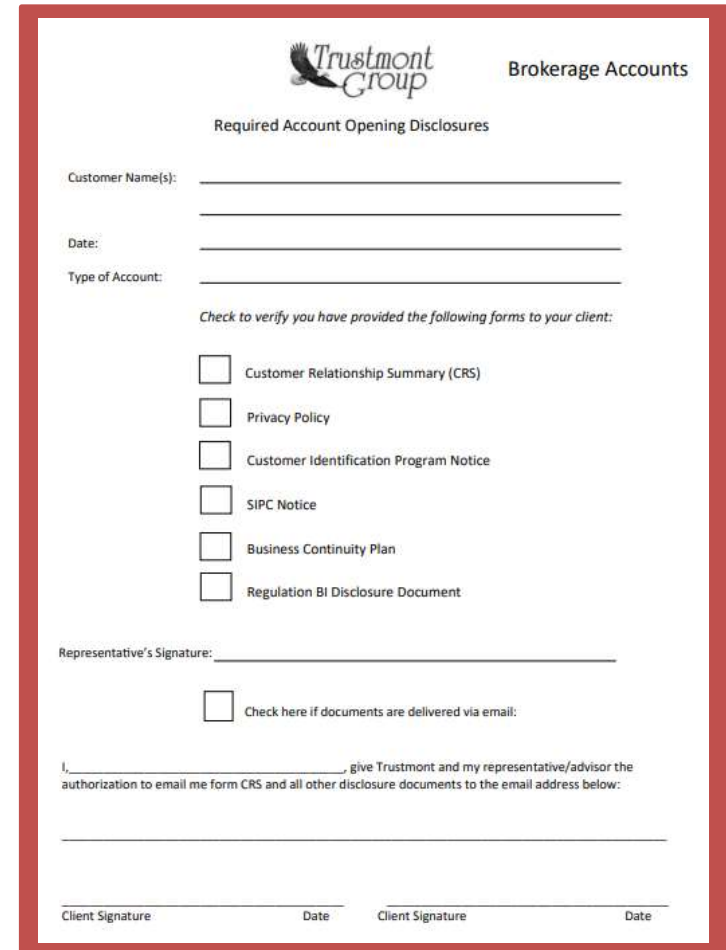
\_\_\_\_\_  
Client Signature Date Client Signature Date

\*Initial mass mailing of CRS & BI disclosure was 6/12/2020

\*CRS- Financial & Advisory

\*BI disclosure- Financial ONLY

\*cover page is to be completed every time CRS is given



**Trustmont Group** Brokerage Accounts  
Required Account Opening Disclosures

Customer Name(s): \_\_\_\_\_  
Date: \_\_\_\_\_  
Type of Account: \_\_\_\_\_

Check to verify you have provided the following forms to your client:

Customer Relationship Summary (CRS)  
 Privacy Policy  
 Customer Identification Program Notice  
 SIPC Notice  
 Business Continuity Plan  
 Regulation BI Disclosure Document

Representative's Signature: \_\_\_\_\_

Check here if documents are delivered via email:

I, \_\_\_\_\_, give Trustmont and my representative/advisor the authorization to email me form CRS and all other disclosure documents to the email address below:

\_\_\_\_\_  
Client Signature Date Client Signature Date



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# Negative Response Letters



Scenic Drive Professional Center  
200 Brush Run Road, Suite A  
Greensburg, PA 15601

724-468-5665  
Fax: 724-468-5675  
www.trustmontgroup.com

Date:

Customer  
Street  
City, State, Zip

Dear Customer

As required by the Financial Industry Regulatory Authority (FINRA), I am required to verify your account information at a minimum once every three years. To meet this requirement, I have enclosed a copy of the most recent client profile form on file for your account(s).

Please take a few minutes to review the information contained therein, and if there are any changes, please contact me within 15 days of the letter date. If all information remains unchanged, you need do nothing, and I will consider the information to be current.

As always, please feel free to contact me with any questions that you may have.

Thank you for your prompt attention to this matter.

Sincerely,

Registered Representative

All securities offered through Trustmont® Financial Group, Inc. · Member FINRA-SIPC  
Registered Investment Advisory Services offered through Trustmont® Advisory Group, Inc.

- \*This letter/form will be implemented starting January 1, 2022
- \*This will replace any existing negative response letter you are currently using
- \*A copy of the letter and CPF provided with it should be submitted to Audrey just like you would submit a new/updated client profile form
- \*This letter will be emailed to you and is on the Trustmont Website, if you have your own pre-approved letterhead you will add the letter to that otherwise you will use the letter that is already on Trustmont letterhead



4th Quarter 2021 Webinar  
End of the Year Wrap-up

# 2021 Annual Representative Questionnaire

## Page 2

### Notes:

Q19-Outside Personal Accounts

Q20-Pre-clearances

Q21-Advertising approval

Q24-Webinars

Q26 & 34-Devices & Cyber Security

Q27-CRS (cover page)

mass mail date: 6-12-2020

Q28 & 29-CPF & Negative Response letters

Q30-cellphone (we will be calling both office & cell to check disclosures)

Q32-Professional designations

Q33-Office Personnel

Q37-Extended time away

19. 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.
20. 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.
21. I have and will continue to obtain prior written approval for all advertising, sales or marketing materials, newspaper articles, radio or TV broadcasts, blogs, seminars, and social media posts, etc. I understand that requests for approval are to be sent through the link on the Trustmont website ([www.trustmontgroup.com](http://www.trustmontgroup.com)) 14 days in advance of requested date of use.
22. 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](http://www.trustmontgroup.com)).
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24. I have participated in or viewed the recording for all mandatory webinars for the current year.  
Check boxes for webinars attended or viewed:  1stQ  2ndQ  3rdQ  4thQ
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26. I have notified Trustmont of any changes, additions, or discontinuations to my electronic devices by completing the certification form on the Trustmont website ([www.trustmontgroup.com](http://www.trustmontgroup.com)).
27. I understand that I am required to provide Form CRS to customers/potential customers when a recommendation is made of particular securities, investments, or investment strategies. I understand that I am required to maintain a record of everyone to whom the CRS has been provided.
28. In the past 12 months, I have provided clients with the principally signed client profile forms (CPF) when completing new business, material changes or 36-month updates.
29. 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.
30. I have disclosed to Trustmont the use of a cell phone in my securities business. I also certify that my cellphone voicemail has the proper disclosure as listed on the Trustmont website. PROVIDE cell phone#: \_\_\_\_\_ (if you do not use a cell phone in your business write N/A on the line)
31. In the past 12 months, I have not had any unsatisfied judgements or liens filed against me. If yes, explain in the boxes on page 5.
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## Voicemail Message



**Please check all phones used for business purposes to make sure you have the proper disclosure added at the end of your voicemail message; this includes cell phones when used for securities business**



Please do not leave trade instructions on this voicemail as such instructions cannot be honored. If you are calling during market hours and need immediate assistance, please call the home office of Trustmont Financial at 1-800-618-3666.

Thank you



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[Office Requirements >>](#)

▶ Representative / Advisor Resources

▶ Policies & Procedures

▶ Join Trustmont Group

LOG OUT

## Potentially Required Forms

MOST forms below need pre-approval, email completed forms from this section to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com), fax to 724-468-5675, or mail to the home office attention compliance department.

- **Cash & Non-Cash Compensation Log**  
Required when you wish to attend a meeting, seminar, training that will be paid for by a third-party product sponsor or provider (including travel expenses, meals, lodging, prizes, awards, etc). Also required if/when a third party pays, in whole or in part, for an educational meeting, seminar, event you host. Payments must be pre-approved and recorded in this log. Please note: Registered Representatives may NOT receive any cash compensation directly from outside firms or persons.
- **Intent to Use Social Media Sites**  
Required for making a change to any already approved social media or when you want to use any new social media for business or personal use. You must receive approval prior to using.
- **Outside Business Activities**  
Upon being hired by Trustmont, you were required to disclose all outside business activities for which you are an owner, officer, principal, president, partner, etc. as well as other entities you are employed by or doing business as. This includes outside activities you receive compensation for (nonprofits, board appointments, rental properties, notary public, etc). After your initial disclosure of this information, additional outside business activities or any change in existing outside business activities are **NOT** permitted without pre-approval from Compliance. See FINRA rule 3270 for more information.
- **Private Securities Transactions**  
Registered individual are strictly prohibited from engaging in private securities transactions (any transaction not sponsored or approved by an authorized principal of this broker-dealer) without pre-approval.
- **Political Contributions Quarterly Log**  
Required quarterly for all reps that are making political contributions to any government entity, official, or candidate. This includes but is not limited to state representatives, school board candidates, political action committees, presidential campaigns, etc. Form should be emailed to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) or faxed directly to Trustmont on no less than a quarterly basis. 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](mailto:compliance@trustmontgroup.com) with the subject line of "political contribution for approval". Please include the amount and receiving party in your email along with any other details.
- **Cyber Security & Electronic Device Disclosure**  
Required if you make a change to your cyber security or electronic devices within your office.
- **Certification of Outside Brokerage Account**  
Required quarterly for any outside personal account in which the custodian does not provide statements directly to the home office.
- ★ **Personnel Disclosure**  
Required to disclose all office personnel/staff members and if/when employment is terminated
- **Negative Response Letter (on Trustmont letterhead)**  
To be mailed to your client with a copy of most recent CPF when completing a 36-month update if in person is not possible. A copy of the letter and accompanying CPF should be submitted to the operations department just as you would a new/updated CPF, any client response to the letter should also be submitted to operations.
- **Negative Response Letter (without Trustmont letterhead - to be put on your own PREAPPROVED letterhead if you have it, if not you must use other letter)**  
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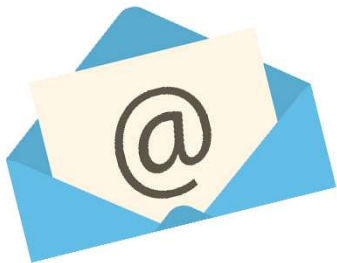
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LET US  
KNOW!

It is very important that you keep the back office informed when you will be away from the office for an extended time period.



For example: illness, vacation, hospitalization, etc.

**\*If you are going to be out longer than a day, put an out of office automatic reply on your email**



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# 2021 Annual Representative Questionnaire

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Notes:

Q39-Consolidated Reports

Q40-Online meetings

Q41-CRM

Q42-Financial Planning

Q43-Discretionary Authority

Q44-Stationary

Q45-Political Contributions

## Non-Public Personal Information

38. Do you 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?  Yes  No  
If yes, are you familiar with Trustmont's Written Supervisory Procedures (WSP's) on protection of digital customer information and do you comply with its requirements?  Yes  No

## Consolidated Reports

39. 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

40. 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)

41. Do you use a CRM Program?  Yes  No If yes, provide program used \_\_\_\_\_

## Financial Planning Software (Note: If new this year provide copy of contract)

42. Do you use Financial Planning Software?  Yes  No If yes, provide program used \_\_\_\_\_

## Discretionary Authority

43. 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 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?  Yes  No
- 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

## Stationery

44. 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 approval?  Yes  No  
if yes, select which ones from the list below. (Note: if newly created this year provide copy)

- |   |   |
|---|---|
| <input type="checkbox"/> business card  | <input type="checkbox"/> printed envelope             |
| <input type="checkbox"/> letterhead     | <input type="checkbox"/> brochure                     |
| <input type="checkbox"/> fax coversheet | <input type="checkbox"/> other (explain in box below) |

## Political Contributions

45. Have you or any member of your household (including your spouse, domestic partner, minor children, or other dependents residing in your home) made any Political Contributions during the past 12 months that have not been previously disclosed?  
 Yes  No If yes, provide recipient, date, and amount in box below

- If applicable, have you received approval for any contributions over \$250?  Yes  No

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## REPORTS



As a reminder if you are providing consolidated reports from Portfolio Pathways, Morningstar, etc copies of those need to be submitted on a monthly basis

**\*they should be emailed to**

**[reports@trustmontgroup.com](mailto:reports@trustmontgroup.com)**

**\*any self-created report/letter needs prior approval before giving to the client**



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## ONLINE MEETINGS



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**



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[Potentially Required Forms >>](#)

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## Potentially Required Forms

MOST forms below need pre-approval, email completed forms from this section to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com), fax to 724-468-5675, or mail to the home office attention compliance department.

- **Cash & Non-Cash Compensation Log**  
Required when you wish to attend a meeting, seminar, training that will be paid for by a third-party product sponsor or provider (including travel expenses, meals, lodging, prizes, awards, etc). Also required if/when a third party pays, in whole or in part, for an educational meeting, seminar, event you host. Payments must be pre-approved and recorded in this log. Please note: Registered Representatives may NOT receive any cash compensation directly from outside firms or persons.
- **Intent to Use Social Media Sites**  
Required for making a change to any already approved social media or when you want to use any new social media for business or personal use. You must receive approval prior to using.
- **Outside Business Activities**  
Upon being hired by Trustmont, you were required to disclose all outside business activities for which you are an owner, officer, principal, president, partner, etc. as well as other entities you are employed by or doing business as. This includes outside activities you receive compensation for (nonprofits, board appointments, rental properties, notary public, etc). After your initial disclosure of this information, additional outside business activities or any change in existing outside business activities are **NOT** permitted without pre-approval from Compliance. See FINRA rule 3270 for more information.
- **Private Securities Transactions**  
Registered individual are strictly prohibited from engaging in private securities transactions (any transaction not sponsored or approved by an authorized principal of this broker-dealer) without pre-approval.
- **Political Contributions Quarterly Log**  
Required quarterly for all reps that are making political contributions to any government entity, official, or candidate. This includes but is not limited to state representatives, school board candidates, political action committees, presidential campaigns, etc. Form should be emailed to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) or faxed directly to Trustmont on no less than a quarterly basis. 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](mailto:compliance@trustmontgroup.com) with the subject line of "political contribution for approval". Please include the amount and receiving party in your email along with any other details.
- **Cyber Security & Electronic Device Disclosure**  
Required if you make a change to your cyber security or electronic devices within your office.
- **Certification of Outside Brokerage Account**  
Required quarterly for any outside personal account in which the custodian does not provide statements directly to the home office.
- **Personnel Disclosure**  
Required to disclose all office personnel/staff members and if/when employment is terminated
- **Negative Response Letter (on Trustmont letterhead)**  
To be mailed to your client with a copy of most recent CPF when completing a 36-month update if in person is not possible. A copy of the letter and accompanying CPF should be submitted to the operations department just as you would a new/updated CPF, any client response to the letter should also be submitted to operations.
- **Negative Response Letter (without Trustmont letterhead - to be put on your own PREAPPROVED letterhead if you have it, if not you must use other letter)**  
To be mailed to you client with a copy of most recent CPF when completing a 36-month update if in person is not possible. A copy of the letter and accompanying CPF should be submitted to the operations department just as you would a new/updated CPF, any client response to the letter should also be submitted to operations.



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# 2021 Annual Representative Questionnaire

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## Notes:

Q39-Consolidated Reports

Q40-Online meetings

Q41-CRM

Q42-Financial Planning

Q43-Discretionary Authority

Q44-Stationary

Q45-Political Contributions

### Non-Public Personal Information

38. Do you 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?  Yes  No  
If yes, are you familiar with Trustmont's Written Supervisory Procedures (WSP's) on protection of digital customer information and do you comply with its requirements?  Yes  No

### Consolidated Reports

39. 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

40. 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)

41. Do you use a CRM Program?  Yes  No If yes, provide program used \_\_\_\_\_

### Financial Planning Software (Note: If new this year provide copy of contract)

42. Do you use Financial Planning Software?  Yes  No If yes, provide program used \_\_\_\_\_

### Discretionary Authority

43. 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 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?  Yes  No
- 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

### Stationery

44. 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 approval?  Yes  No  
if yes, select which ones from the list below. (Note: if newly created this year provide copy)

- |   |   |
|---|---|
| <input type="checkbox"/> business card  | <input type="checkbox"/> printed envelope             |
| <input type="checkbox"/> letterhead     | <input type="checkbox"/> brochure                     |
| <input type="checkbox"/> fax coversheet | <input type="checkbox"/> other (explain in box below) |

### Political Contributions

45. Have you or any member of your household (including your spouse, domestic partner, minor children, or other dependents residing in your home) made any Political Contributions during the past 12 months that have not been previously disclosed?  
 Yes  No If yes, provide recipient, date, and amount in box below

- If applicable, have you received approval for any contributions over \$250?  Yes  No

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End of the Year Wrap-up



# Political Contributions

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](mailto:COMPLIANCE@TRUSTMONTGROUP.COM) WITH THE SUBJECT LINE OF POLITICAL CONTRIBUTION FOR APPROVAL. PLEASE INCLUDE AMOUNT AND RECEIVING PARTY IN YOUR EMAIL.**

All political contributions under \$250 per individual per election must be reported no less than on a quarterly basis to the compliance department and include date, amount and person/party receiving contribution.

\*You will also certify on the Annual Rep Questionnaire every year starting in 2022 that all contributions have been disclosed to Trustmont and all contributions over \$250 were pre-approved

\*for more information see MSRB Rules G37/38



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### Political Contributions Quarterly Log

Registered Representative: \_\_\_\_\_ Quarter: \_\_\_\_\_ Year: \_\_\_\_\_

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

\_\_\_\_\_  
Compliance Initials/Date

\*This form will be required quarterly starting January 2022

**only if you are making contributions**

\*Will be emailing to all reps along with the link to this webinar by Monday

\*It is available on the Trustmont Website

\*It should be emailed to [compliance@trustmontgroup.com](mailto:compliance@trustmontgroup.com) or faxed to 724-468-5675 quarterly or as contributions are made throughout the year



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# 2021 Annual Representative Questionnaire

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## Notes:

Q46-shared office space (refers to sharing office space with a representative that is registered with another broker-dealer or registered investment advisor.

Q49-401k plans (refers to accounts managed or that you are the rep of record on)

Q50-Social Media

46. Do you share any form of office space with any individual or entity not registered with Trustmont?  Yes  No  
If yes, provide names in box below.

47. Do you have any financial or business relationships outside of your activities associated with Trustmont?  Yes  No  
If yes, provide names in box below. Are Trustmont clients involved?  Yes  No

48. 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)

49. Do you manage any 401k plans?  Yes  No  
If yes, list plans under management in the box below. (If more space is required list on page 5)

50. **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?  Yes  No

**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

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[Request for Approval of Position of Trust or Beneficiary >>](#)

[Request for Outside Account >>](#)

[Pre-Clearance Request Form >>](#)

[Check Register >>](#)

[Correspondence Report >>](#)

★ [Gift & Gratuity Log >>](#)

★ [Potentially Required Forms >>](#)

[Office Requirements >>](#)

▶ Representative / Advisor Resources

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- ★ **Intent to Use Social Media Sites**  
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Please use this page if you need additional space to answer any of the questions on the 2021 annual questionnaire

Question #    Details

Question #	Details

# 2021 Annual Representative Questionnaire

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this page is for you to provide additional details for questions on the previous pages that you may not have had enough room to provide a complete explanation



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# 2021 Annual Representative Questionnaire additional pages



## Trustmont Financial Group and Trustmont Advisory Group, Inc. 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, 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 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 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 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 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 act in accordance with the policies set forth herein at all times.

## Ethics Policy

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



## Annual Certification of Holdings

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 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 duplicates it will be my 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 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 \$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 months, please attach a copy of the most recent statement for those accounts. **If an account below is highlighted in yellow you are required to submit the most recent statement with this form for that account.**

Custodian	Account Number	Account Owner	Type of Account	Type of Investments (MF, ETF, Stock, UITs, VA, Other)	Self Directed? Yes or No

## Certification of Holdings

Each rep should have received 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 questionnaire



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**! MANDATORY !**

**Webinar Schedule - 2022**

February 10, 2022

May 12, 2022

August 11, 2022

November 10, 2022

\*all will take place at 2-3PM EST

