



Trustmont Group

February 18, 2021 1st Quarter Mandatory Webinar
Goodbye 2020, Hello 2021!



1st Quarter 2021 Webinar
Goodbye 2020, Hello 2021!

Reg BI

CRS: When is it required to be given to an investor, customer, or prospect?



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SEC Adopts Modernized Marketing Rule for Investment Advisers

FOR IMMEDIATE RELEASE
2020-334

Washington D.C., Dec. 22, 2020 — The Securities and Exchange Commission today announced it had finalized reforms under the Investment Advisers Act to modernize rules that govern investment adviser advertisements and payments to solicitors. The amendments create a single rule that replaces the current advertising and cash solicitation rules. The final rule is designed to comprehensively and efficiently regulate investment advisers' marketing communications.



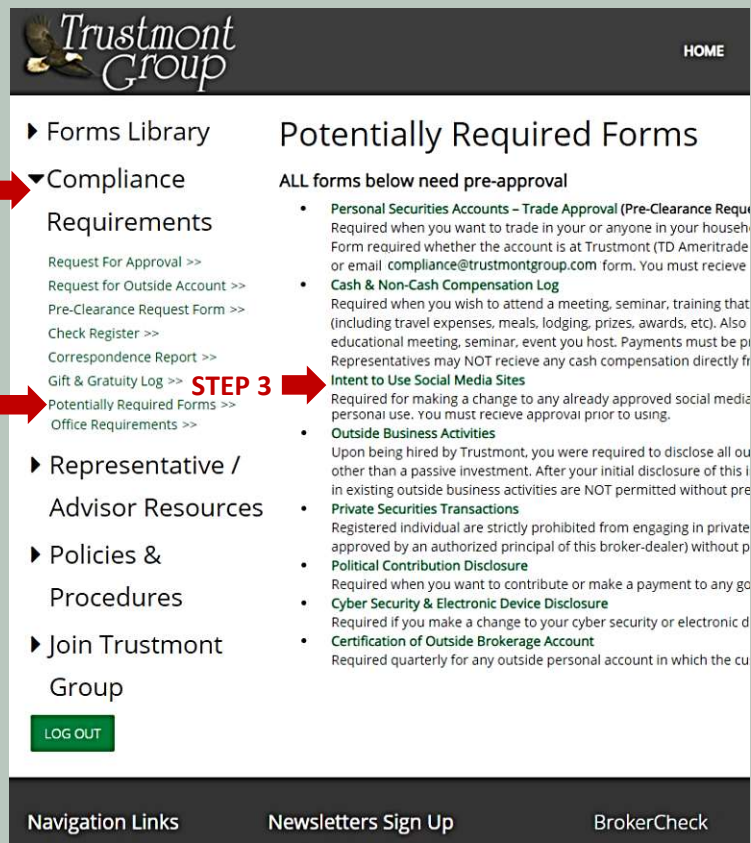
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Social Media

Are you looking to start using **Social Media** in your business?

*Complete the **Intent to Use Social Media** form on the website www.trustmontgroup.com

*Email it to compliance@trustmontgroup.com



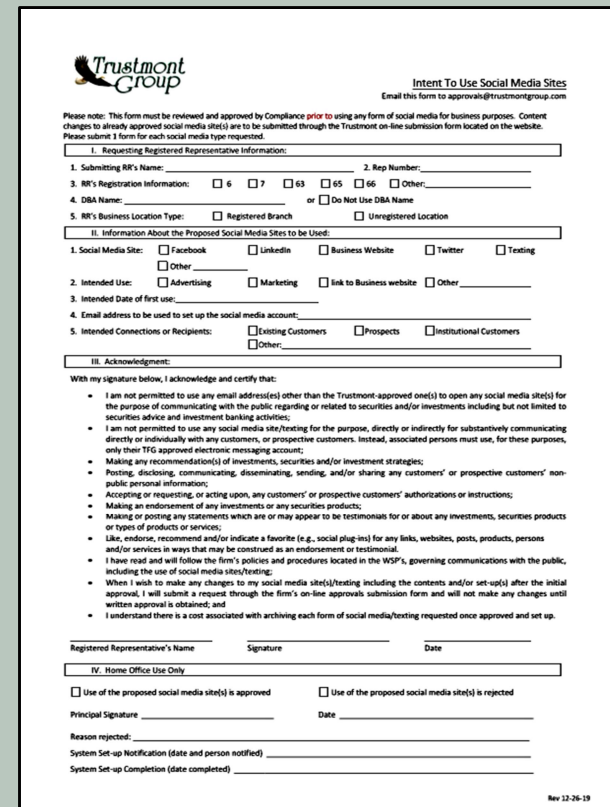
The screenshot shows the Trustmont Group website navigation menu. The 'Forms Library' section is expanded to show 'Compliance Requirements' and 'Potentially Required Forms'. A red arrow labeled 'STEP 1' points to 'Compliance Requirements', and another red arrow labeled 'STEP 2' points to 'Potentially Required Forms'. A third red arrow labeled 'STEP 3' points to the 'Intent to Use Social Media Sites' form within the 'Potentially Required Forms' section.

Trustmont Group HOME

- Forms Library
 - Compliance Requirements
 - Request For Approval >>
 - Request for Outside Account >>
 - Pre-Clearance Request Form >>
 - Check Register >>
 - Correspondence Report >>
 - Gift & Gratuity Log >>
 - Potentially Required Forms >>
 - Office Requirements >>
 - Representative / Advisor Resources
 - Policies & Procedures
 - Join Trustmont Group

LOG OUT

Navigation Links Newsletters Sign Up BrokerCheck



The form is titled 'Intent To Use Social Media Sites' and includes a 'Please note' section at the top. It is divided into four main sections: I. Requesting Registered Representative Information, II. Information About the Proposed Social Media Sites to be Used, III. Acknowledgment, and IV. Home Office Use Only. Section I includes fields for name, registration number, DBA name, and business location. Section II includes checkboxes for social media sites and intended uses. Section III contains a detailed acknowledgment statement. Section IV includes fields for signatures and dates.

Trustmont Group Intent To Use Social Media Sites
Email this form to approvals@trustmontgroup.com

Please note: This form must be reviewed and approved by Compliance prior to using any form of social media for business purposes. Content changes to already approved social media site(s) are to be submitted through the Trustmont on-line submission form located on the website. Please submit 1 form for each social media type requested.

I. Requesting Registered Representative Information:

1. Submitting RR's Name: _____ 2. Rep Number: _____
3. RR's Registration Information: 6 7 63 65 66 Other: _____
4. DBA Name: _____ or Do Not Use DBA Name
5. RR's Business Location Type: Registered Branch Unregistered Location

II. Information About the Proposed Social Media Sites to be Used:

1. Social Media Site: Facebook LinkedIn Business Website Twitter Texting
 Other: _____
2. Intended Use: Advertising Marketing Link to Business website Other: _____
3. Intended Date of first use: _____
4. Email address to be used to set up the social media account: _____
5. Intended Connections or Recipients: Existing Customers Prospects Institutional Customers
 Other: _____

III. Acknowledgment:

With my signature below, I acknowledge and certify that:

- I am not permitted to use any email address(es) other than the Trustmont approved one(s) to open any social media site(s) for the purpose of communicating with the public regarding or related to securities and/or investments including but not limited to securities advice and investment banking activities;
- I am not permitted to use any social media site/texting for the purpose, directly or indirectly for substantively communicating directly or individually with any customers, or prospective customers. Instead, associated persons must use, for these purposes, only their TFG approved electronic messaging account;
- Making any recommendation(s) of investments, securities and/or investment strategies;
- Posting, disclosing, communicating, disseminating, sending, and/or sharing any customers' or prospective customers' non-public personal information;
- Accepting or requesting, or acting upon, any customers' or prospective customers' authorizations or instructions;
- Making an endorsement of any investments or any securities products;
- Making or posting any statements which are or may appear to be testimonials for or about any investments, securities products or types of products or services;
- Like, endorse, recommend and/or indicate a favorite (e.g., social plug-ins) for any links, websites, posts, products, persons and/or services in ways that may be construed as an endorsement or testimonial.
- I have read and will follow the firm's policies and procedures located in the WSP's, governing communications with the public, including the use of social media sites/texting;
- When I wish to make any changes to my social media site(s)/texting including the contents and/or set-up(s) after the initial approval, I will submit a request through the firm's on-line approvals submission form and will not make any changes until written approval is obtained; and
- I understand there is a cost associated with archiving each form of social media/texting requested once approved and set up.

Registered Representative's Name _____ Signature _____ Date _____

IV. Home Office Use Only

Use of the proposed social media site(s) is approved Use of the proposed social media site(s) is rejected

Principal Signature _____ Date _____

Reason rejected: _____

System Set-up Notification (date and person notified) _____

System Set-up Completion (date completed) _____

Rev 12-26-19



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Variable Annuities

**If adding \$50,000 or more to an existing Variable Annuity,
APPROVAL is required**

**If less than \$50,000 but it represents 25% or more of the current
account value, APPROVAL is required**



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Helpful Tips from Operations Department



Having your clients add a **Trusted Contact** is important...

 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:
(These forms can be found on the Trustmont website under "Forms Library")

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:

Make sure to complete the required account opening disclosure form for all new brokerage accounts



All paperwork should be complete before submitting



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Gift Log vs Political Contributions



Trustmont Gift & Gratuity Log

Use this form to enter each gift or gratuity you provide to a client. Enter only one item per form. Click "Submit" below when finished.

FINRA Rule 3220

No member or person associated with a member shall, directly or indirectly, give or permit to be given anything of value, including gratuities, in excess of one hundred dollars per individual per year to any person, principal, proprietor, employee, agent or representative of another person.

All representatives are required to file a gift and gratuity log at least quarterly, even if the register contains no entries. Is this a required quarterly filing that contains no entries? Yes No

If this is a required quarterly filing with no entries, select "Trustmont Financial" in the next question, enter your representative name and e-mail address where requested, and enter the word "quarterly" in every subsequent question.

Which Trustmont Unit? Trustmont Financial (Broker) Trustmont Advisory

Enter Your Trustmont Representative Number:

Representative's Last Name:

Representative's First Name:

Email Address:

Date:

Recipient Last Name:

Recipient First Name:

Face value:



Political Contribution Disclosure

This form must be completed by the Registered Representative/Investor Advisor Representative at the time of appointment with Trustmont and as each occurrence makes reporting necessary.

Pursuant to 206(4)-5 under the Investment Advisers Act, covered persons must disclose their political contribution(s) or payment(s) made to any government entity, officials or candidates for the prior two years since the date the person becomes subject to such reporting requirement.

Contribution means any gift, subscription loan, advance, or deposit of money or anything of value made for: (i) the purpose of influencing any election for federal, state or local office; (ii) payment of debt incurred in connection with any such election; or (iii) transition or inaugural expenses of the successful candidate for state or local office.

Government entity means any state or political subdivision of a state, including: (i) any agency, authority, or instrumentality of the state or political subdivision; (ii) a pool of assets sponsored or established by the state or political subdivision or any agency, authority or instrumentality thereof, including, but not limited to a "defined benefit plan" as defined in section 414(j) of the Internal Revenue Code, or a state general fund; (iii) a plan or program of a government entity; and (iv) officers, agents, or employees of the state or political subdivision or any agency, authority or instrumentality thereof, acting in their official capacity.

Official means any person (including any election committee for the person) who was, at the time of the contribution, an incumbent, candidate or successful candidate for elective office of a government entity, if the office (i) is directly or indirectly responsible for, or can influence the outcome of, the hiring of an investment adviser by a government entity; or (ii) has authority to appoint any person who is directly or indirectly responsible for, or can influence the outcome of, the hiring of an investment adviser by a government entity.

Payment means any gift, subscription, loan, advance, or deposit of money or anything of value.

I have made no political contributions in the past two years.

Date of political contribution:

Recipient of contribution:

Amount of contribution:

(Please attach additional page to report additional contributions.)

Do you have a client who is a government entity, official, or candidate as defined above? Yes No
If yes, explain:

Name (print)

Signature

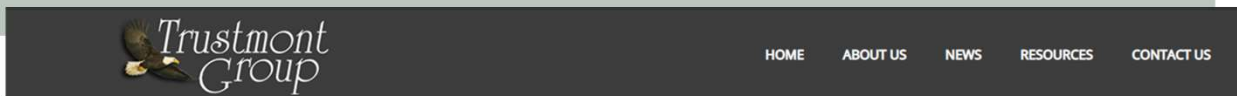
Date



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Check the Trustmont Website



► Forms Library

Step 1 ► Compliance Requirements

- Request For Approval >>
- Request for Outside Account >>
- Pre-Clearance Request Form >>
- Check Register >>
- Correspondence Report >>
- Gift & Gratuity Log >>
- Potentially Required Forms >>
- Office Requirements >>

Step 2 ► Representative / Advisor Resources

► Policies & Procedures

► Sign in Trustmont Group

Potentially Required Forms

ALL forms below need pre-approval

- **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 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 the past 12 months, other than a passive investment. After your initial disclosure of this information, additional changes to your outside business activities in existing outside business activities are NOT permitted without pre-approval from Compliance.
- **Private Securities Transactions**
Registered individuals are strictly prohibited from engaging in private securities transactions without the prior written approval by an authorized principal of this broker-dealer) without pre-approval.
- **Political Contribution Disclosure**
Required when you want to contribute or make a payment to any government entity.
- **Cyber Security & Electronic Device Disclosure**
Required if you make a change to your cyber security or electronic devices within the last 12 months.
- **Certification of Outside Brokerage Account**
Required quarterly for any outside personal account in which the custodian does not have a relationship with Trustmont.
- **Personnel Disclosure**
Required to disclose all office personnel/staff members and if/when employed.

Trustmont Group
Certification of Office Personnel

Registered Reps are required to disclose all office personnel/staff members that they have working for them as well as when any personnel/staff members employment is terminated by completing the table below:

This is an initial report
 I have personnel to remove
 I have a change in work capacity for previously reported personnel

I have new personnel to report
 I have no office personnel

Personnel Name	Work Capacity (Title, Job Dates, etc)	New Hire?	Already Registered?

If you cannot certify the truth and accuracy of any item listed above, please 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 18 U.S.C. 480A relating to unsworn statements.

Registered Representative's Signature/Date _____
Compliance Initials/Date _____

Rev 12-1-2021

Trustmont Group
Annual Certification of Cyber Security & Electronic Device Disclosure

Information of our customer submissions is our priority. And for this disclosure to protect our customer accounts and information has never been made available to any third party. Accordingly, to ensure that our customer's confidential information is protected from any outside cyber threats, please refer to Section 19 on these required questions.

Are your computers and devices used for your securities business protected with up-to-date antivirus software, firewall software, and anti-malware software? Yes No

Are all your computers and devices used for your securities business protected with a strong password that is frequently changed? Yes No

Do all of your devices have software updates up to date? Yes No

Do you use a portable storage device (external hard drive, thumb drive, CD, DVD, etc.) to store customer's confidential information? Yes No

Do you use a portable storage device (external hard drive, thumb drive, CD, DVD, etc.) to store customer's confidential information for business purposes? Yes No

Associated persons are required to disclose the use and/or termination of use of any electronic device used directly or in part for business purposes by completing the table below:

This is an initial report of electronic devices
 I have a retired device to report
 I have a change in usage of a previously reported device to report
 I have a new device to report
 I have no changes in devices

Device Type (make, model, etc.)	Operating System Used	% Business Use	% Personal Use

If you cannot certify the truth and accuracy of any item listed above, please 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 18 U.S.C. 480A relating to unsworn statements.

Registered Representative's Signature/Date _____
Compliance Initials/Date _____


Rev 12-16-2019



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Personnel Disclosure



 **Certification of Office Personnel**

Registered Reps are required to disclose all office personnel/staff members that they have working for them as well as when any personnel/staff members employment is terminated by completing the table below:

This is an initial report I have new personnel to report
 I have personnel to remove I have no office personnel
 I have a change in work capacity for previously reported personnel

Personnel Name	Work Capacity (title, job, duties, etc)	New hire?	Already Fingerprinted?

If you cannot certify the truth and accuracy of any item listed above, please 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 relating to unsworn falsification.

 Registered Representative's Signature/Date

 Compliance Initials/Date

Rev 1-11-2021

- * To be completed every time you add or remove a staff member**
- * If adding include work capacity so that we can determine if fingerprinting is necessary**

NOTE: If fingerprinting is required the home office will be in touch to begin the process



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Device Disclosure



Trustmont Group
Annual Certification of Cyber Security & Electronic Device Disclosure

Protection of our customer information is our priority, and our obligation to protect our customer accounts and information has never been more important than it is today. Accordingly, to ensure that our customer's non-public information is protected from any potential cyber-crimes, the firm implemented the policies and procedures addressing the protection of Digital Customer Information that are located in section 39 of the WSP's. Please refer to section 39 for more detailed information.

Are your computers and devices used for your securities business protected with up-to-date antivirus software, firewall software, and anti-malware software? Yes No

Are your computers and devices log-in privileges protected by a strong password that is frequently changed? Yes No

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

Do you certify that ONLY associated personnel have access to your computers and devices? Yes No

Do you use a portable storage devices (external hard drives, thumb drives, CDs, DVDs, etc.) to store customer's non-public personal information? Yes No. If yes, do you certify that either the device or the data is encrypted (be prepared to provide proof of encryption upon request)? Yes No

Associated persons are required to disclose the use and/or termination of use of any electronic device used entirely or in part for business purposes by completing the table below:

This is an initial report of electronic device(s) I have a new device to report

I have a retired device to report I have no changes in devices

I have a change in usage of a previously reported device to report

Device Description (example: "primary office computer") Include smartphones, tablets and other devices	Device Type (example: iMac, Dell PC desktop, iPhone, etc)	Operating System Used	% Business Use	% Personal Use

If you cannot certify the truth and accuracy of any item listed above, please 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. 4909 relating to unsworn falsification.

Registered Representative's Signature/Date _____ Compliance Initials/Date _____

Rev 12-26-2019

*** To be completed every time you add and/or remove a new device**

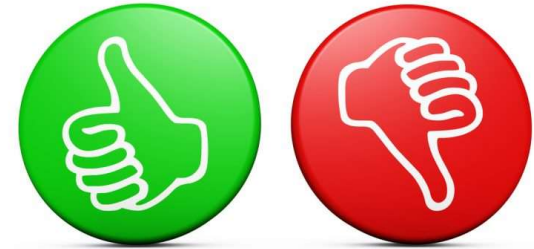
*** This includes cell phones if used for securities business**

1. cell phone must have trade instructions disclosure
2. cell number must be provided on form



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Approvals Required



- * **Adding or changing CRM and/or Financial planning software**
- * **Purchasing Bitcoin**
- * **Conducting zoom meetings with your clients**
- * **Opening personal outside accounts**
- * **Sending a self created advertising piece to more than 25 clients. This includes letters, cards, emails, etc.**
- * **Starting a new outside business activity**



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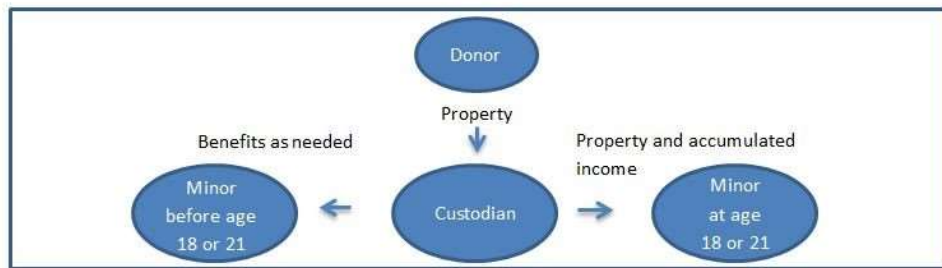
COMPLIANCE

REMINDERS



January's **Check Log** was due **February 15th**
January's **Correspondence Log** was due **February 15th**

How UGMA and UTMA Work



Check your email
DAILY

Make sure to check the website for additional important reminders



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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
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.



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Any Questions?





MANDATORY



Webinar Schedule - 2021

May 13, 2020 2:00-3:00 pm EDT

August 12, 2020 2:00-3:00 pm EDT

November 11, 2020 2:00-3:00 pm EST

A photograph of a laptop keyboard and a document with a grid, overlaid with a dark blue semi-transparent rectangle containing the text "ALTERNATIVE INVESTMENTS". The text is in a white, sans-serif font, with "ALTERNATIVE" on the top line and "INVESTMENTS" on the bottom line, separated by a thin white horizontal line.

ALTERNATIVE
INVESTMENTS

Open discussion with Pete & Tony