

INSTITUTIONAL SERVICES

Let Us Guide You ON YOUR JOURNEY



FINANCIAL RESOURCES GROUP
Investment Services

 **LPL Financial**

Networking Arrangements with Financial Institutions

When a Financial Institution offers Retail Non-Deposit Investment Products either on or off the premises, specific rules apply in order to comply with applicable regulatory requirements.

Applicable Laws & Regulations/Guidance:

- FINRA Rule 3160: Networking Arrangements Between Members and Financial Institutions
- Regulation R
- Title II of the Gramm-Leach-Bliley Act (GLBA)

** This presentation is for internal use only. It is not intended to be all encompassing and is intended for use as a summary only. If you need additional information on any of the topics set forth in this summary or have questions about your responsibilities as Designated Contact, Program Manager, or Advisor, please refer to the applicable provisions of LPL's Advisor Compliance Manual or Written Supervisory Procedures, contact your Financial Institution's LPL OSJ Manager/Home Office Supervisor or call LPL's Compliance Service Center.*

Networking Arrangements



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Networking Arrangements

- Generally defined as an arrangement governed by a written agreement whereby a broker-dealer offers investment services on or off the premises of the Financial Institution.
- Sets forth, among other things, the responsibilities of LPL and the Financial Institution, the compensation arrangements, and the restrictions on the activities of personnel who are not licensed with LPL. Policies and procedures adopted by LPL Financial and the Financial Institution are intended to both comply with the law and with the terms of the networking agreement.

Designated Contact Requirements

All Financial Institutions in a networking arrangement with LPL must have a designated contact person for facilitating communications between LPL and the Financial Institution.

- Should not have day to day involvement in the business or compliance functions of the investment program and, accordingly, are typically not registered with LPL or considered to be "associated persons"
- May be responsible for fulfilling the FI's obligations set forth in the networking agreement and/or compliance with applicable laws governing FI's in networking arrangements.
- May also have the power to set policy at the Financial Institution and approve non-securities related compensation.
- Must have general awareness and understanding of the relevant laws and certain LPL policies and procedures to help ensure compliance with the Financial Institution's obligations, as well as to avoid inadvertently taking an action that may directly or indirectly cause LPL associated persons to violate the law (e.g., implement sales goals under an incentive program to grow the Financial Institution's investment business).
- Will be issued an LPL e-mail address to receive certain compliance e-mails from LPL and an Institutional Compliance Summary, but will not have any other LPL access.
- As described more fully below, the role of the Designated Contact may be fulfilled by the Program Manager.

Program Manager

If the Financial Institution has a Program Manager, the manager's responsibilities will vary per investment program.

- Primary roles - may act as the Designated Contact; act as the interface between LPL and the FI's advisors; help grow the investment program at the Financial Institution.
- Have a more direct involvement in the business of the investment program and are typically presumed to be "associated persons".
- Must comply with all applicable securities laws and those governing the bank or credit union — and applicable LPL policies and procedures.
- May or may not be registered with LPL depending on job functions. If the Program Manager is not registered, he or she may only perform those functions that are permissible for other non-licensed associated persons of LPL.
- Must be identified to LPL immediately upon assignment to the role.
- Any changes to these DC or PM roles and/or responsibilities must be promptly communicated to LPL.
- OSJ will collaborate with the PM for escalated risk scenarios and matters that require consequence management (i.e. sanctions).

Financial Institution Responsibilities



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Financial Institution Responsibilities

Financial Institutions (FI) - Federal and State Chartered Banks, Savings and Loan Associations, Savings Banks, Credit Unions, and the service corporations of such institutions required by law.

Retail Non-Deposit Investment Program (RNDIP)

- It is the responsibility of the Financial Institution to adopt a written statement for their investment program that addresses the risks associated with the sales of non-deposit investment products to retail customers.
- Contains a summary of policies and procedures outlining the features of the institution's program.
- Should be adopted and reviewed periodically by the Financial Institution's Board of Directors.
- Will be reviewed by OCC or NCUA.

Policy & Procedures (At a minimum)

- The roles of the FI, third party broker, and dual employees.
- Features of the program including types of products that will be offered and the criteria governing the FI's selection and review of each type of product sold or recommended.
- Compliance procedures for ensuring compliance with applicable laws and regulations.
- Designation of specific individuals to exercise supervisory responsibility for each activity outlined in the FI's policies and procedures.
- Designation/authorization of employees to sell investment products, description of their related responsibilities, the responsibilities of other personnel who may have contact with retail customers concerning the investment program; and any appropriate and inappropriate referral activities, the training requirements and compensation arrangements for each class of personnel, and any limits on their activities.
- Description of where non-deposit sales may take place and how those sales will be separated from deposit-taking activities.
- Procedures for the use of customer's personal information in connection with retail sales of non-deposit investment products, including information that may be transferred between the FI and the broker-dealer.
- Customer disclosures – Discussed in detail later in this presentation.

Physical Setting



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Physical Setting

The primary focus is mitigating customer confusion and to avoid giving a misleading impression that the products are insured by the FDIC or NCUA or are obligations of the Financial Institution.

Distinct Physical Layout

- Distinct from the area which the financial institution's retail deposits are taken.
- Appropriate signage must be used in order to help make clear what services are being offered.
- Desks separate from the financial institution's retail deposits.
- No LPL/broker-dealer services literature should be located in/near the teller lines/windows.
- No references to FDIC or NCUA insurance should be on or near the desk or in the area in which the advisor operates.

Broker-Dealer Name Clearly Displayed

- Current signage – work with Marketing and Regulatory Review (MRR) – approved prior to use
- Current LPL disclosures indicating that LPL is the entity providing brokerage services, not the Financial Institution or the d/b/a name. "Securities offered through..."

Physical Setting

Broker-dealer Services Clearly Distinguished

- Signs within the space are required to contain certain customer disclosures, including that LPL's securities and insurance products are:
- Not deposits or other obligations of the bank or credit union.
- Not insured by the FDIC or NCUA (as applicable) or any other federal or state government agency.
- Not guaranteed by the Financial Institution.
- Subject to investment risks, including possible loss of the principal invested.
- SIPC Sign

Mixed-Use Offices

- Portable, desktop signage must be used when the office or desk is used for both LPL's and the Financial Institution's business or when an advisor meets with a client off the premises. This signage can be obtained from MRR
- Signage placed near front edge of desk, clearly visible to clients during an advisor's discussions.
- Remove all FI/FDIC/NCUA noted material and marketing and replace with the non-deposit investment product signage.
- Avoid meeting in places with permanent FI/FDIC/NCUA signage
- Whenever possible, hold customer meetings in office space furthest away from the teller line.

Branch Registration Requirements



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Branch Registration Requirements

Financial institution locations where LPL Financial conducts business may be required to register as a branch office with LPL Financial and FINRA.

Branch Office

- Registration as a Branch Office is required when a location is identified by any means to the public or customers as a location at which a FINRA member, such as LPL Financial, conducts securities business.
- Registration as a branch office is also required when a location is also held out as a place where securities business is conducted on a regular, or semi-regular, schedule, such as every Thursday.
- All branch offices are required to have copies of customer files and required compliance files.

Satellite Office

- Not held out to the public in any manner as a place where investment/securities business is offered or conducted.
- Business is only conducted occasionally and exclusively by appointment.
- No regular or semi-regular schedule.
- No permanent FINRA signage, manuals, or SIPC signs.
- No customer/compliance files should be kept at these locations as long as above conditions met.
- Very limited advertising (ex: small window sticker) indicating that the LPL Financial representative is available by appointment and provide the telephone number of the registered branch office where the representative may be contacted.

Use of a DBA Name

- Requires review and approval prior to use. Use the OBA tool in ClientWorks for submission.
- The DBA name may not contain the word “bank” or “credit union.”
- If your investment program's DBA name uses the same acronym as the FI does, then it must be followed by an acceptable qualifying term. (Ex: Allied Credit Union calling itself "ACU" in its branding.)
- The use of the word "financial" does not create the necessary distinction and therefore will not be allowed in cases where the FI and the investment program both use the same acronym.
- Acceptable examples: “ACU Wealth Management” or “ACU Investment Services”
- The term "financial" may still be used for FI’s that do not use acronyms and instead use the terms "bank" or "credit union" in their institutional branding. For example, if the institution brands as "Allied Credit Union," the DBA for the investment program could be called "Allied Financial Services."
- The use of a DBA requires the use of proper accompanying disclosures.
- Ex: “Securities offered through LPL Financial, Member FINRA/SIPC. Insurance products offered through LPL Financial or its licensed affiliates. LPL Financial is a Registered Investment Advisor. (FI) and (DBA) are not registered broker/dealers and are not affiliated with LPL Financial. Specific tax advice not provided. You are advised to seek tax advice from your own tax professional.”
- Consult with MRR on DBA and required disclosures and obtain approval prior to use.

Business Continuity Planning

- In accordance with FINRA Rule 4370, each/all branch office locations must create and maintain a written business continuity plan (“BCP”) identifying procedures for meeting its obligations to customers during an emergency or significant business disruption. These procedures must additionally address existing relationships with other broker-dealers and counter-parties where applicable.
- LPL provides a BCP template, available in the Resource Center
- Must be tested and reviewed annually and will be inspected during audit. Testing procedures/checklist are included as part of the BCP template.
- Must cover both internal and external significant business interruptions.
- Must be updated whenever there is a material change to the branch’s or LPL’s operations, structure, business or location.
- Must be reasonably designed to enable the branch to meet its existing obligations to customers, typically in a worst-case-scenario situation.
- Must be signed/approved by the onsite manager/advisor.
- The FI’s BCP is acceptable to use in place of LPL’s only if it makes specific reference to, and provisions for, the investment program and its clients.

Files/Record Keeping Requirements

- All compliance and client files must be maintained for each Registered Branch Location.
- Must be kept electronically within iDoc in ClientWorks.
- Client files must be separated by registration and by type (advisory vs. brokerage).
- All outside business related files must be maintained separately.
- Check Receipt Log
- Advertising File
- Sponsor Approved Advertising File (if applicable)
- All versions of business cards, letterhead and envelopes used by everyone in this branch office
- Incoming Correspondence -Brokerage
- Outgoing Correspondence -Brokerage
- Complaint File -Brokerage
- Complaint File -Options
- Complaint File -Commodities (if applicable)
- Do Not Call List
- Signature Guarantee Log (if applicable)
- Cash/Non-Cash Compensation Log
- Daily Deposit Report (if using local deposit program)
- Remote Deposit Check File (if applicable)
- Non-Local Deposit Check Log
- Securities Receipt Log
- FINRA manual (or web access)
- Operations Manual and Compliance Manual (or access to Resource Center)
- Client Files
- Prospectus Delivery Log
- Branch Office Business Continuity Plan
- If transacting advisory business:
 - Advisory Advertising File
 - Advisory Complaint File
 - Advisory Incoming Correspondence File
 - Advisory Outgoing Correspondence File
- If registered with the SEC or the state as a Registered Investment Advisor:
 - RIA Advertising File
 - RIA Complaint File
 - RIA Incoming Correspondence File
 - RIA Outgoing Correspondence File
 - RIA Ledger of Fees Billed I Received

Individual Registration



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Requires Registration

Individual Registration Requirements - Registration requirements depend on the specific duties performed at the Financial Institution in connection with LPL's business. Examples of activities that may require registration are set forth below.

- Recommending any security or giving any other form of investment advice.
- Describing investment vehicles, such as mutual funds, discussing the merits of any security/type of security, or handling any customer question that might require familiarity with the securities industry or the exercise of judgement regarding securities and investment alternatives.
- Solicitation of new accounts, orders, or products/services offered by LPL.
- Qualifying prospective clients as to financial status, investment history, or objectives.
- Accepting trade instructions directly from clients.
- Sharing in commissions or fees.
- Performing supervisory functions with respect to LPL's securities business.

Does NOT Require Registration

- Referring bank customers or credit union members to LPL advisors.
- Providing written materials that give general information on the availability of LPL services as a means of identifying the LPL Representative and how to make contact should the customer be interested in a non-deposit investment product.
- Clerical/administrative matters in connection with the investment program.
- Some functions and/or LPL systems access may require “associated” status as a non-registered individual.

Outside Business **Activities** of FI Employees Registered with LPL Financial

- Outside Business Activities are very broadly defined as any business or commercial services other than securities services, including civic/charitable activities.
- Any participation in an OBA requires disclosure to, and pre-approval from, LPL.
- Employment at or by a FI is considered to be an outside business activity (OBA) and requires prior written approval by LPL Financial.
- DBA usage is also considered an OBA with same prior approval requirement.
- Submitted through OBA tool in ClientWorks.

Compensation



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Compensation Plan Approval

- LPL review and approval required of all proposed compensation plans.
- The Financial Institution's compensation plan and any proposed material changes must be submitted to the Central Supervision Unit for prior approval.
- Details provided include:
 - All advisors and other personnel involved in the accumulation and redistribution arrangement.
 - The specific method of redistribution (revenue share/split/payment).
 - The specific compensation received by each advisor under the arrangement.
- LPL will conduct random sampling and testing of compensation plans to make sure comp is being paid in accordance with the FI's approved plan on file.

Non-Licensed Individuals

- Compensation for Non-licensed FI personnel is strictly regulated under the securities laws.
- Permitted types of comp for a non-registered individual, regardless of whether that person participates in LPL 's investment program:
 - **Salary** - Non-licensed Financial Institution personnel may be paid an hourly or annual salary. (Cannot be based upon any form of commissions or other securities transaction-based compensation.)
- **Referral Fees** - Nominal fee may be paid for bank customer or credit union member referrals to LPL.
 - Nominal = \$25, twice a person's hourly base salary, or 1/1000 of a person's annual base salary.
 - One fee only per referred customer.
 - Cash Only (no vacation packages, consumer goods, stock grants, or any other type of non-cash comp for referrals in lieu of nominal cash compensation).
 - Must be paid direct by FI (not by LPL or an LPL representative).
 - Cannot depend on referral results such as an account opening or a securities transaction.
- **Bonuses** – Permissible to pay but cannot be used to circumvent the prohibition of commissions or transaction-based comp.
 - Paid on a discretionary basis.
 - Based on "multiple, significant factors or variables" not related to securities transactions.
 - Should not include customer or member referrals made to the investment program as a factor.
 - Can be based on overall profitability of FI.
 - Can be based on the overall profitability or revenue of the investment program as long as it is only one of the factors considered, and the other conditions above are met.

Prohibited Cash Compensation Practices

- Discriminatory Compensation - includes differential compensation based on the sale of certain products — which could include broad product categories (ex. ETFs, variable annuities, or alternative investments) or specific investment products (ex. Jackson National Elite Access VA or SPY) — or the sale of certain sponsors (ex. Hartford or PIMCO products).
- Directly or indirectly sharing commissions with an unregistered person.
- Directly or indirectly sharing commissions with persons registered with another broker-dealer (without prior written approval of LPL).
- Compensation to non-registered persons that is not based on a fixed, previously-agreed upon salary.
- Compensation to non-registered persons tied to the commissions and/or fees earned by the registered representative contributing to a compensation pool.

Sales Incentive Policy

- Sales incentive programs include sales contests and any reward, bonus, incentive or promotion related to the offer, sale or distribution of securities, products or services through LPL, including bank or credit union investment programs.
- May create an actual or perceived conflict of interest and potentially harm customers and/or damage the reputations of the FI, LPL, and the advisors.
- Reps and FI's are prohibited from directly or indirectly sponsoring, participating in, or facilitating any sales contests; or offering, accepting or making payments of cash or non-cash comp in connection with any sales incentive programs.
- Arrangements subject to or covered by an LPL approved compensation plan may be exempt.

Customer Disclosures & Communications w/ Public



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Required Disclosures When Opening New Customer Accounts

- When conducting LPL's broker-dealer business pursuant to a networking arrangement, the advisor must inform customers, both orally and in writing, at or prior to the time of account opening that securities products and insurance products being offered or sold:
 - Are offered and sold through LPL and its registered representatives, and not the Financial Institution.
 - LPL is not an affiliate of the Financial Institution.
 - Not a deposit or obligation of, or guaranteed by, the Financial Institution or its affiliates.
 - Are not insured by the FDIC, NCUA, or any federal or state government agency (as applicable).
 - Subject to investment risks, including possible loss of the principal invested.
 - The FDIC, NCUA or a federal or state governmental agency, may insure certain certificates of deposit and cash sweep accounts.
 - The Financial Institution's extension of credit may not be conditioned on the purchase of an investment, insurance or annuity product from LPL or the Financial Institution.
 - The client may purchase insurance or annuities from a provider of his or her choice.
 - LPL is a member of FINRA and the Securities Investor Protection Corporation (SIPC). SIPC covers losses in investment accounts of up to \$500,000 (of which up to \$250,000 may be un-invested cash) due to member firm failures and does not cover a decline in the market value of securities. Additional information about SIPC and asset protection may also be found at www.sipc.org.
- The written disclosures are provided to the client in the new account agreement.
- The account opening process commences at the time of first contact between the advisor and the customer.
- A new account will not be opened (and will be restricted from transacting business) until all required documentation is received and in good order, including additional IS disclosure section.

How to Explain the FI/REP/LPL Relationship

- Your Financial Institution and LPL are not affiliates, but instead have entered into a networking agreement that, through a referral program, may allow LPL and its financial advisors to provide investment products and services on or off the premises of your Financial Institution. In some cases, the financial advisors may be employed by the Financial Institution. However, when the financial advisors are offering investment products and services, they are doing so through the LPL Investment Program, and they are registered with LPL for the purpose of offering those products and services. The agreement between LPL and your Financial Institution also provides for LPL to compensate the Financial Institution for the use of its facilities and for client referrals, such that a significant portion of the compensation generated by the sale of investment products and services may be paid to the Financial Institution. Your LPL financial advisor is compensated directly or indirectly by LPL for the products and services offered through the LPL Investment Program. In the event that registered representatives are Financial Institution employees, the Financial Institution may directly pay, from amounts received from LPL, the registered representatives' compensation in respect of such sales.

Communications with the Public

- All Communications with the Public must be reviewed and approved by MRR prior to use.
- Includes all types of advertisements, pamphlets, signs, letterhead, business cards, and websites.
- Certain materials may require FINRA approval.
- Only the LPL approved materials may be provided to potential customers and current customers of LPL.
- Avoid co-mingling FI materials with broker-dealer related materials.
- Proper disclosures required. In addition to DBA disclosures, must use:
 - Not deposits or other obligations of the bank or credit union.
 - Not insured by the FDIC or NCUA (as applicable) or any other federal or state government agency.
 - Not guaranteed by the Financial Institution.
 - Subject to investment risks, including possible loss of the principal invested.
- Any changes or updates to content, including websites, requires re-review and approval by MRR.
- All confirmations and account statements shall indicate clearly that the broker-dealer services are being provided by the broker- dealer.

Prohibitions

Engaging in any practice, making misleading statements, or using any communication with the public that could cause a client or prospective client to believe:

- A securities or insurance product is backed by the Federal or State Government or the Financial Institution.
- There is no investment risk, or that there is no risk of loss of principal, or risk of decline in value for a product where there is such a risk.
- The securities or insurance product is insured by the FDIC or NCUA.
- LPL and the Financial Institution are affiliates.
- The Financial Institution is registered as a broker-dealer or investment advisor.
- Investment products or services are offered by or on behalf of the FI, rather than LPL.
- The financial advisor is acting on behalf of the Financial Institution, rather than LPL.
- The advisor is supervised by the Financial Institution, rather than LPL.
- The advisor does not receive commissions from the sale of securities or insurance products.
- Making an extension of credit from the FI conditional upon the purchase of a securities or insurance product from the Financial Institution, or any of its affiliates, or a prohibition on obtaining a securities or insurance product from an unaffiliated entity.

Gifts & Gratuities / Business Entertainment



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FRGIS Contact Information

For escalated inquiries, please contact us using IS@FRGatLPL.com or your assigned OSJ delegate.

Gifts & Gratuities/ Business Entertainment

- Covers giving and receiving gifts and gratuities and engaging in business entertainment.
- Policies applicable to all associated persons of FI investment program, including both licensed and unlicensed personnel, and unlicensed Program Managers.
- Unlicensed Designated Contacts are not subject to the policies, but should have an understanding of the limitations.

Gifts & Gratuities

- \$100 limit per year, per person, giving or receiving in relation to the business of LPL.
- Reported/logged on the Cash/Non-Cash Compensation Log (F151) and maintained in the branch files.
- Includes raffles, giveaways and door prizes.
- Valued at the greater of its actual cost or actual value.
- Associated persons in same FI may not separately give the same client gifts that total an amount over \$100.
- Event tickets (e.g., football game, theater) are subject to the gift policies when the associated person does not attend the event with the recipient. If you do attend the event with the recipient, the business entertainment policy applies.
- Certain exceptions may apply for immediate family members, charitable contributions, promotional items of nominal value, and gifts for life events.

Business Entertainment

- Includes, for example, an occasional meal, a trip to a sporting event or theater, or comparable entertainment.
- Avoid conduct that could be perceived as an improper quid pro quo.
- Can't be so frequent or excessive as to raise any question of impropriety.
- Reported/logged on the Cash/Non-Cash Compensation Log (F151) and maintained in the branch files.
- May not be preconditioned on achievement of a sales target.
- You must be present when providing business entertainment for clients and prospects.
- You are not permitted to seek reimbursement for such events.
- Sponsors must pay the venue or provider directly. Product sponsors should be present when providing business entertainment; if not, they must be acknowledged as having provided funds.
- For a single business entertainment event, the maximum is \$500 per attendee plus guest and business entertainment may not exceed \$1,500 per year, per giver or recipient.
- If spouse/guest of attendee are invited, they must be included in the \$500 and \$1500 limits.

Miscellaneous Policies



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Purchases and Sales of **Proprietary** Bank Stock

- Advisors are prohibited from soliciting transactions of securities (including debt securities) issued by a bank or credit union with which it has a lending relationship (“proprietary bank stock”).
- Proprietary bank stock can only be bought/sold on an unsolicited basis.
- LPL will send a negative consent non-solicitation letter to confirm the purchase was unsolicited.

Other Prohibited Practices

- Solicit or direct clients to any investment product(s) or service(s) not currently approved and offered on LPL's platform.
- Personally invest in any investment product or vehicle not offered on LPL's platform without prior written consent of LPL.
- Using an email address/domain that is not being captured and archived by LPL.
- Sending unencrypted communications that may contain client PII.
- Sending client PII to a 3rd party without written client consent. (F456 Form)
- Texting with clients or about LPL business other than through LPL's approved texting app.
- Using an instant messaging application that is not captured and archived by LPL.
- Use of Discretion in brokerage accounts and annuity sub-accounts. Use only where expressly granted in SAM/Advisory accounts.
- Programs must always be aware of potential information sharing conflicts between investment versus bank platforms.

Other Prohibited Practices (Cont.)

- Non-genuine signature use, use of white out, cutting or pasting, reusing, modifying, maintaining blank or incomplete signed documents, or altering any document in any way after client initial/signature.
- Using any form of loan proceeds to fund an investment purchase. Selling or advising on reverse mortgages is strictly prohibited.
- Accepting trade orders or money movements via email, voicemail, or fax from clients. ALWAYS verbally confirm.
- Front-running – trading in your personal or related accounts ahead of your clients' accounts.
- Participation in chat rooms, bulletin boards and instant messaging.
- Accepting or offering personal loans to/from customers.
- Completing Verification of Deposit forms, collateral agreements, or signing any indemnification agreements on behalf of LPL.
- Acting as trustee, successor trustee, co-trustee, power of attorney, or executor over any assets or having custody or control over client or non-client funds.
- Trading is not allow in a deceased client's account. Please contact LPL's Death Divorce Service Team for assistance with the process or questions.

Miscellaneous Policies

Branch Exams

- OSJ Locations: annually
- Non-OSJ Locations: at least once every 3 years, but may be annually
- Offices of Convenience/Satellite Locations: at least once every 3 years.
- May also be assigned for cause, scheduled on an unannounced basis, or for re-examination or on an as-needed.
- The Branch Exam team will review areas specific to your particular networking arrangement, including your functions as the Financial Institution's Program Manager or Designated Contact, and conduct an interviews.
- OSJ or Branch Exams will help coordinate scheduling and remediation steps for Branch Examinations.

Ongoing Requirements

- Continuing Education, Annual Compliance Meeting, and Annual Questionnaire will be required of all associated persons.
- Compensation plan reviews will be conducted at random to help determine whether compensation is being paid in accordance with the Financial Institution's approved plan on file.
- The Designated Contact or Program Manager must meet on at least an annual basis with the field office OSJ or Home Office Supervisor to discuss business and compliance related issues particular to your Financial Institution's networking business, including the key topics covered in this presentation. Must be documented.
- **Escalation Policy** – Applies to Advisors, Non-Registered associated persons, PMs, and DCs.
 - Immediately report to the field office OSJ, Home Office Supervisor, or Early Dispute Resolution (EDR) ALL customer complaints and/or grievances.
 - Immediately report all apparent violations of LPL policies and procedures to the field office OSJ, Home Office Supervisor, or Compliance, Legal and Risk (CLR).

FRGIS Specialized Institutional Services

For escalated inquiries, please contact us using IS@FRGatLPL.com or your assigned OSJ delegate.

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