



COMPLIANCE QUICK START GUIDE

GLOBAL RETIREMENT PARTNERS (GRP)

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The purpose of this document is to introduce our compliance program and provide a general overview of key compliance related activities.

Advisor teams are encouraged to review the [GRP Compliance Manual](#) for more information and details regarding compliance requirements.



GRP'S APPROACH TO COMPLIANCE

"Our primary goal is to protect our clients by partnering with our Investment Advisor Representatives (IARs) to ensure both their practices and our firm remain compliant with industry regulations. We aim to design policies and procedures that not only meet regulatory standards but also support the entrepreneurial spirit of our advisors, using our regulatory expertise to help them succeed."

-Cosmo Gould, Chief Compliance Officer

COMPLIANCE CONTACTS



Cosmo Gould

GRP RIA Chief Compliance Officer and LPL OSJ
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Document Submission: ComplianceDocs@grpfinancial.com

Customer Correspondence: Correspondence@grpfinancial.com

Client Invoice Submission: Invoices@grpfinancial.com

General Compliance Questions: GRPCompliance@grpfinancial.com

Branch and IAR Registration Requests: BranchOperations@grpfinancial.com



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Ask Me About: General Compliance and Outside Business Activities



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Ask Me About: General Compliance and RIA Code of Ethics



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Ask Me About: General Compliance and Client Account/Trade Monitoring



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Ask Me About: Scheduling Time with Cosmo and Compliance Resources

COMPLIANCE TOOLS

Global Retirement Partners (GRP) leverages multiple tools to centralize and support advisor teams with tracking and management of the requirements of our compliance program.



Orion Compliance

<https://compliance.basiscode.net>

Orion Compliance is a cloud-based compliance system that provides GRP teams with a centralized location for compliance related tasks and resources.



Fiduciary Decisions (FDI)

<https://fdi.fiduciarydecisions.com>

Fiduciary Decisions (FDi) is the tool GRP teams are required to use to document rollover activity.



Quest CE

<https://learn.questce.com/>

Quest CE is the vendor GRP has selected to deliver State mandated IAR continuing education.

ORION COMPLIANCE

Orion Compliance (<https://compliance.basiscode.net>) is the primary tool you will use to complete a variety of compliance tasks, submit and track compliance approval requests, and locate key resources to maintain your regulatory and firm compliance requirements.

Examples of how [Orion Compliance](#) is used within GRP's Compliance Program:

- Quarterly Compliance Attestations
- Ongoing Certifications for various compliance topics
- IAR Registration Maintenance/Disclosures: Outside Business Activities (OBAs), Personal Trading Accounts (PTAs), Advertising and Marketing, etc.
- IAR Disclosures: Potential Customer Complaints, Political Contributions, Trade Error Documentation, Gifts and Entertainment, etc.
- Compliance Resource Library: Written Policies and Procedures, Code of Ethics, ADV Part 2A and Form CRS, Firm Privacy Policy, etc.

You should have been provided with access to this tool as part of your onboarding. If you currently do not have access, please contact a GRP compliance team member.

We strongly recommend exploring the tool to familiarize yourself and your team with how it can and should be utilized to maintain your compliance tasks.



[Forgot password?](#)

By logging in you agree to the [Terms of Use](#).

Log In

ORION COMPLIANCE

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Orion Compliance Tips:

To Do – This section will reflect any outstanding items our compliance team has assigned to you for completion. Action is required.

Shortcuts – Orion Compliance provides shortcuts to commonly used tasks/resources such as:

- **Manage Trading Accounts:** disclose or update personal trading accounts
- **View Certs & Attestations:** access copies of all previously completed compliance certifications and attestations
- **Report Incident:** whistleblower reporting
- **Submit Form:** access all forms available to you to report or request compliance approval for certain registration and securities business management
- **Outside Business Activities:** submit, update and track OBA activities for compliance review
- **Visit Doc Library:** access important compliance resources such as Written Policies and Procedures and Code of Ethics

The screenshot shows the Orion Compliance Launch Portal dashboard. The browser address bar displays <https://compliance.basiscode.net/launch>. The dashboard header includes the Orion Compliance logo, the text "LAUNCH PORTAL", and a welcome message "Welcome, Aimee". Navigation links for Home, Trading, Forms, Certs, Outsider, and Library are present. The main content area is titled "Launch Portal / Dashboard" and features a "To Do" section with a table showing "Due" and "To Do Items" (0 total). To the right, a "Shortcuts" section displays six buttons: "Manage Trading Accounts", "View Certs & Attestations", "Report Incident", "Submit Form", "Outside Business Activities", and "Visit Doc Library".

ROLLOVER POLICY AND THE FDI TOOL



Fiduciary Benchmarks is now Fiduciary Decisions. We have a different name but our mission remains the same – to provide you with data, tools and insights that will improve your business and deliver better outcomes for your clients. Our rebranding means that our website address has changed. So, you may need to update your bookmarks and password manager with our new address – www.fiduciarydecisions.com

Your session expired. Sign in again to continue.

Log In to Fiduciary Decisions

Email

Password

Log In

[Forgot Password or New Here?](#)



GRP's Rollover Policy requires IARs to document any rollovers to a GRP advisory account (solicited or unsolicited) in the [FDI Rollover Documentation Tool](#).

The following rollover activities require documentation in the tool:

- Plan to IRA Rollover
- IRA to IRA Transfer
- Plan to Plan Rollover (recommendation)

All GRP Teams are required to review the information regarding the Rollover Policy and FDI Tool training videos on our website: www.grpfinancial.com -> *Advisor Login* (passcode 2330) -> *Rollover Training*.

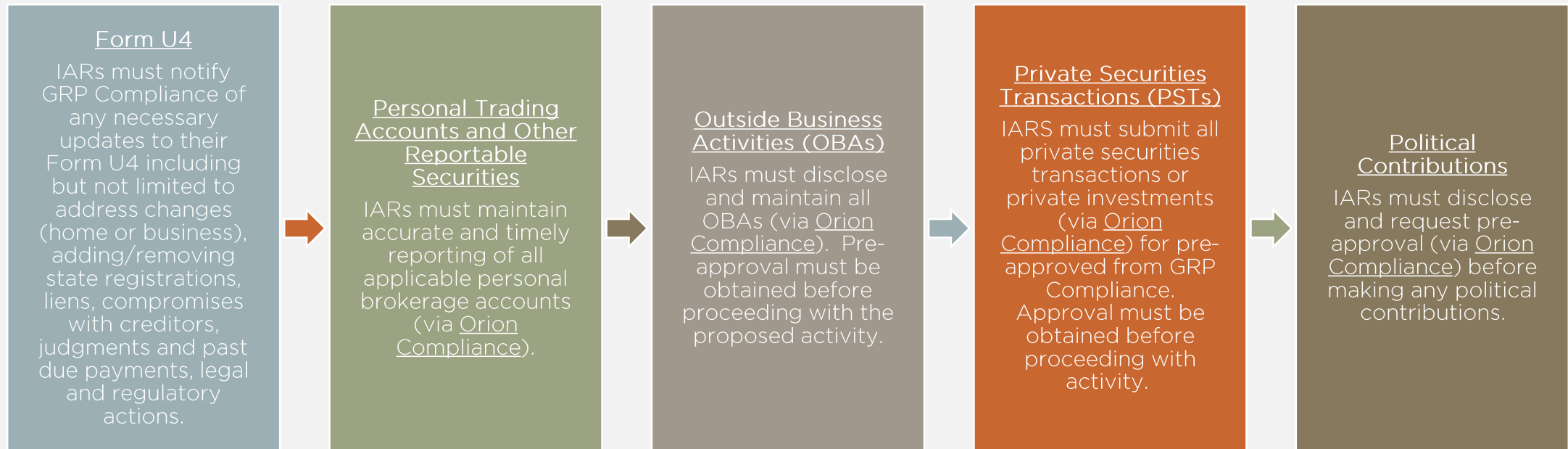
ROLLOVER POLICY

(CONTINUED)

Important Reminder for “Hybrid Advisors” (individuals registered with both GRP RIA and LPL Broker Dealer)

- LPL policy currently prohibits the recommendations of rollovers. As such, if any portion of a rollover may be going to an LPL brokerage account, you are prohibited from making any recommendation regarding rollovers and are limited to providing information and education only. However, you would use the tool to document any resulting *unsolicited* rollover to a GRP advisory account.
- If 100% of a rollover will be going to an LPL brokerage account, then this tool would not apply but you are limited to providing only education and information and must refrain from giving a recommendation.
- Rollover recommendations will only be permitted if 100% of the funds will be rolled into an advisory account and properly documented within the tool.

REGISTRATION MAINTENANCE REQUIREMENTS



Additional reporting requirements apply for IARs also registered with a Broker Dealer.

CONTINUING EDUCATION

As you may know, certain states have recently adopted an annual CE requirement to maintain your advisory license. We anticipate all states will adopt this requirement in the near future. GRP will issue guidance each year to any affected IARs with instructions on how to complete the requirement however, it is ultimately the responsibility of each licensed individual to ensure that all securities related CE requirements have been met by October 31st.

Please review the table for an example of CE requirements licensed individuals may be subject to.

Be sure to plan accordingly to complete all necessary CE well in advance of the October 31st deadline to avoid suspension of your license(s) and possible disciplinary action.

CE REQUIREMENT	WHERE TO ACCESS CE	DEADLINE TO COMPLETE
FINRA Regulatory CE	FinPro	October 31
State Required IAR CE	Quest CE	October 31
LPL Firm Element CE*	LPL Learning Center	October 31
<i>Note: Any other CE requirements related to maintaining professional designations or insurance licensing are the responsibility of the IAR to track and complete.</i> *Applicable for LPL Broker Dealer affiliation only.		



GRP Form ADV Parts 2A, 2B and Form CRS

GRP Teams must ensure that current versions of the GRP Form ADV Part 2A, Part 2B (IAR brochure supplement), and Part 3 (“Form CRS”) are utilized with GRP clients and prospects.



New Client Requirement

IARs are responsible for delivery of GRP’s ADV Part 2A, 2B and Form CRS (where applicable) to each new client or prospective client prior to engaging in advisory services.



Ongoing Client Requirement:

IARs are responsible for delivering GRP’s Annual Offer Notice of the ADV Part 2A, along with the Privacy Policy, to all GRP clients each year at the instruction of GRP Compliance. Documentation of delivery is required to be maintained in the branch records.

DISCLOSURE DOCUMENT DELIVERY



COMPLIANT OFFICE SET UP

- **Branch Office Security Policy** – GRP Teams must be familiar with and agree to abide by GRP's branch office security policy (found in the GRP Compliance Manual).
- **Office Sharing** – Compliance pre-approval is required prior to setting up any office sharing arrangements, including but not limited to, sharing space with any person(s) not associated with LPL and/or GRP or designating any space within a registered branch location for “hoteling” purposes. Another example of office sharing that would require approval would be “hybrid” advisors (registered with both LPL and GRP) sharing space with RIA only advisors (registered with GRP only).
- **Signage** – Any signage related to securities business must be prominently displayed at the entrance of the office and must be separate and distinct from any other lines of business.
- **Employee Updates** – All personnel changes, such as hires, terminations, or status changes, must be reported to BranchOperations@grpfinancial.com as soon as possible to ensure all firm and industry requirements are met.
- **Cybersecurity** – GRP team members must comply with GRP's Cybersecurity Policy (found in the GRP Compliance Manual). GRP Compliance should be contacted as soon as possible if there are any questions or concerns regarding a team's ability to meet the standard requirements, and when a suspected cybersecurity incident should occur (*Orion Compliance -> Forms -> “Privacy Incident Submission Form”*).
- **Email Encryption** – GRP team members must ensure all outgoing emails containing Personally Identifiable Information (PII) or any other sensitive data are properly encrypted.

Additional requirements may apply for individuals with LPL Broker Dealer affiliation. Please refer to LPL's Branch Office Security Policy (BOSP) for more information.

COMPLIANT OFFICE SET UP (CONTINUED)

REQUIRED BRANCH COMPLIANCE REPORTING



Advertising File



Cash/Non-Cash Compensation - [GRP Gifts and NCC Log](#)



Customer Correspondence – Copies of all incoming/outgoing customer correspondence are required to be forwarded to Correspondence@grpfinancial.com for review.



Potential Customer Complaints - All complaints verbal or written must be submitted immediately via [Orion Compliance -> Forms -> Potential Customer Complaint](#) in addition to being maintained in a branch file.



Non-local Deposit Records – [GRP Check Log](#)

Additional files may be required for individuals with a Broker Dealer affiliation.

GENERAL COMPLIANCE

Customer Correspondence

GRP teams must forward copies of all written correspondence sent to or received from clients to Correspondence@grpfinancial.com for review. Some examples of customer correspondence include letters, cover letters, notes, greeting cards, faxes, or any other non-electronic written communication)

Direct Client Invoices

Copies of invoices prepared by GRP teams to be sent directly to a GRP client for payment must be submitted to invoices@grpfinancial.com for review and retention. If invoicing for anything other than a flat fee, supporting documentation for the billed amount must be attached.

Advertising and Marketing

All advertising, sales, and marketing materials must be submitted via Orion Compliance for review and approval (including, but not limited to, email signature blocks, letterhead, business cards, stationary, brochures, seminar slides, bulk letters, website updates, and social media site profiles).

Proxy Voting

GRP firm policy dictates that IARs are not permitted to vote proxies or receive proxy materials on behalf of clients.

Electronic Communications for Securities Business

EMAIL: When conducting any securities related business, a pre-approved email address must be used to be properly captured or journaled to meet supervisory requirements.

INSTANT MESSAGING: The use of instant messaging features available in online meeting software (Zoom, Skype, Microsoft Teams, etc.) is not permitted for internal or external communications unless an exception has been expressly granted by all applicable compliance departments.

TEXTING: MyRepChat is the only solution permitted for GRP related business.

Sponsor Participation in Client Events

Client Events involving sponsor participation/reimbursement require prior approval from GRP Compliance and must comply with the Sponsor Reimbursement policy*.

*Individuals with LPL broker dealer affiliation must comply with LPL's Sponsor Reimbursement For Client Events Policy which does not permit direct payments from Sponsors and Vendors. All Client Events involving sponsor reimbursement require prior approval from LPL Compliance. (See "Sponsor Compliance" in LPL's Resource Center for more information.)

Additional considerations and requirements may apply for individuals with LPL Broker Dealer affiliation. Please consult the LPL Compliance Manual for further information.



INDIVIDUAL WEALTH MANAGEMENT CLIENTS

- **Investment Advisory Agreement (IAA)** - A fully executed Advisory Agreement is required for each advisory client or entity. Copies of these agreements must be forwarded to compliancedocs@grpfinancial.com for processing and retention.
- **Client Meeting Documentation** - IARs are required to meet regularly (at least annually) with each advisory client for a full review of the client's objectives, risk tolerance, and financial situation, and to maintain the appropriate documentation for such meetings in the client's files. GRP's *Client Meeting Documentation form* or your approved CRM may be used to document client meetings.
- **Financial Planning Agreement** - If providing financial planning for a fee, a fully executed Financial Planning Agreement is required and must be submitted to compliancedocs@grpfinancial.com for processing and retention. Furthermore, copies of the applicable financial planning report(s) must be submitted to compliancedocs@grpfinancial.com within 5 business days of delivery to the client.
- **Cash Balance in GRP Retail Advisory Accounts** - Any asset-based fees charged on a retail advisory account will be calculated based on the total account balance, including any cash and cash equivalents within the account. Therefore, as a general rule, any cash or cash equivalent balances that exceed 35% of the account balance should not be maintained in the account for a period longer than 180 days (6 months). In instances where it is appropriate for the client to maintain a large cash balance for any period longer than 6 months, other alternatives for holding such cash balances will be utilized, such as brokerage or bank accounts.
- **Client Account Distribution Requests** - GRP teams are responsible for verifying any distribution requests **verbally** with the account owner(s) prior to initiating. Special care and extra caution should be exercised when a distribution request is received electronically, diverges from a client's standing instructions or is being delivered to a new account or unfamiliar third party.

INSTITUTIONAL/RETIREMENT PLAN CLIENTS

- **Investment Advisory Agreement (IAA)** - A fully executed Advisory Agreement is required for each advisory client or entity. Copies of these agreements must be forwarded to compliancedocs@grpfinancial.com for processing and retention. Termination of any agreement with GRP requires written notice to be sent to or from the client and a copy must be provided to GRP Compliance.
- **Client Meeting Documentation** - IARs are required to meet regularly (at least annually) with each advisory client and to maintain the appropriate documentation form for such meetings (copies of meeting minutes or their equivalent) in the client's file.
- **Retirement Plan Services Review** - Our compliance team will periodically request certain documentation related to the services you provide to a sample of your clients for review and supervision.



CLIENT DOCUMENT SUBMISSION AND PROCESSING

Please see below for GRP's standard procedures for submitting client documents for review and/or processing:

1. Hand-signed copies should be submitted to ComplianceDocs@grpfinancial.com
2. Electronic signature* requests should be submitted using the following:
 - Assign "GRP" as the RIA or GRP signer
 - Send it to ComplianceDocs@grpfinancial.com
 - Use passcode: 1234

**Electronic signatures must be accompanied by a certificate of authentication.*

Leveraging these processes will help to avoid delays. If you have any questions or need assistance, please contact Lien.Tran@grpfinancial.com / 415-526-2763

Document Type	Destination
GRP Client Agreements	ComplianceDocs@grpfinancial.com
Other GRP Forms/Paperwork	ComplianceDocs@grpfinancial.com
Other <u>Client</u> Forms that Require Compliance Review/Signature	ComplianceDocs@grpfinancial.com
Custodian Account Paperwork	Custodian
Vendor Paperwork	Vendor
Any IAR documents related to compliance disclosures or registration.	Orion Compliance or BranchOperations@grpfinancial.com



Orion Compliance
Library



GRP Website:
www.grpfinancial.com
(Advisor Login
Passcode: 2330)

COMPLIANCE RESOURCES