Broadridge
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Pittsburgh, PA 15219
www.fi360.com

Phone: 412.569.3303
Fax: 412.774.2009
Fi360_CEProviders@broadridge.com

For internal use only:

Date application submitted: _____

Date application approved: _____

Approved Provider number: _____

Continuing Education Provider Application

Section I: Organization Information

Organization Name: _____

Mailing Address: _____

Website: _____

Primary Contact Name: _____

Alternate Contact: _____

Primary Contact Phone Number: _____

Primary Contact Email Address: _____

*All future communication with the CE Provider will be done through the primary contact.

Section II: Terms and Conditions

Continuing Education (CE) Providers agree to adhere to all criteria, policies and procedures required by Fi360's CE standards. The Provider agrees that all CE programs submitted for acceptance by Fi360 ("programs") are and will remain correct and current in content and format and contribute to increasing the professional competency of Fi360 Designees. Any change in content and/or format of a program will be reported to Fi360. Acceptance of Provider or programs does not constitute endorsement of programs, certificates or designations conferred as a result thereof.

Fi360 reserves the right to conduct program audits of CE Provider programs at any time. CE Provider status or acceptance of specific programs can be revoked as determined by Fi360 based on results of an audit.

1. **No Endorsement or Sponsorship**. CE Provider acknowledges that Fi360 and its affiliates are not making any endorsement or sponsorship of the CE Provider or its CE Programs or any speaker or content associated with those Programs, whether approved for Fi360's Designations' CE credits, or not, and CE Provider and its employees, affiliates, agents and representatives shall not infer, imply or state, in any method of transmission, that Fi360 has or will endorse or sponsor CE Provider, CE Provider's Programs, related materials or instructors.

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2. **Intellectual Property**. Neither CE Provider nor its employees, agents, representatives or affiliates may use the logos, trademarks, service marks, certification marks, materials, or other intellectual property or proprietary materials of Fi360 or its affiliates, whether registered or copyrighted or not, in the CE Provider's Programs, marketing, business or any other use. Further, CE Provider will indemnify and defend Fi360 from any cause of action that may arise as a result of CE Provider or its employees, agents, affiliates or representatives' unauthorized use of any third-party intellectual property, stemming from or in connection with CE Provider's Provider Application or Program Application, or any Program that occurs or content that is delivered hereunder.

3. **Student/Attendee List**. Consistent with Provider's requirement to send Fi360 a list of Students/Attendees who attend Provider's Programs, Provider agrees to notify the Students/Attendees that their names, company names, and e-mail addresses, and other pertinent information will be provided to Fi360 as part of the CE credit approval process, and Provider will indemnify and defend Fi360 from causes of action that may arise as a result of Fi360's authorized contact with Students/Attendees related to the Programs.

4. **Payment Policies**. No refunds will be provided to Provider for the Provider Application and Program Application fees irrespective of whether i) Provider's application is approved or denied, ii) Programs are not authorized by Fi360, or iii) approved Programs are subsequently cancelled by Provider.

5. **Disputes**. The parties agree to work together in good faith to resolve any disputes that may arise under the Provider Application, Program Application, and related matters. Unsettled disputes will be governed by the laws of the Commonwealth of Pennsylvania without reference to its conflict of laws principles.

6. **Marketing**. Provider acknowledges that Fi360 is not responsible for the promotion or marketing of Provider's status as an approved Provider, and not responsible for the promotion or marketing of Provider's approved Programs. Notwithstanding the foregoing, Fi360 may elect to list Provider's name and a link to Provider's website on Fi360's public website where prospective Students/Attendees may obtain information about Provider and/or its approved Programs.

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Section III: Registration Fee

The $300 annual fee must be paid at the time the application is submitted. Registration for CE Providers is annual and begins on the day the Fi360 Designee Team approves the application. The CE Provider status will expire at the end of the anniversary month. The Primary Contact for the CE Provider will be notified via email prior to the expiration date.

Payment must be submitted before the application is processed.

Once your application is received, you will receive a secure payment link. To complete the payment:

- Click the initial link sent from Broadridge.
- Enter your billing email address.
- Check your inbox for a second email with the final payment link.
- Click the link and enter your credit card or billing information.

Fees are subject to change and are non-refundable.

The registration fee does not include individual program fees.

Send application via mail or fax at (412) 569.3441 or to Fi360_CEProviders@broadridge.com.

Next Steps:

The Fi360 Designee Team will review your application and send email confirmation once received and processed. Processing typically takes 30 calendar days.

Upon acceptance, new CE Providers will be given a Provider ID # with instructions for submitting programs for CE eligibility review subject to meeting Fi360's criteria.

Continuing Education (CE) Credit Criteria:

CE Credit Calculation:

CE Providers are responsible for assigning CE hours to programs submitted. Live programs are eligible for one CE credit hour for each 50 minutes of instruction. Classes must meet a minimum requirement of 50 minutes (excluding quiz/exam time) of instruction time to be credited (no less than one hour of CE credit may be awarded for a given program). After one hour of CE credit is achieved, CE credit hours are rounded down to the nearest half credit hour (ex: 75 minutes = 1.5 CE credit hours).

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The amount of CE credit for self-study activities is determined by the activity provider. The following methods are acceptable for sponsor use in determining self-study credit: average completion time, pilot study, and number of assessment questions (e.g., 10 questions = 1 CE hour). Time spent taking an assessment, such as an exam, may not be included when calculating program CE credit hours.

Activity Requirements

It is the responsibility of the CE Provider to offer CE programs that:

- address one or more acceptable topics;
- contribute to increasing the professional competency of participants;
- are developed and conducted by persons qualified in the subject matter and in instructional design;
- are current and correct in content;
- provide documentation to the attendee/participant by the activity provider;
- are at least 50 minutes in length (50 minutes of content = 1.0 CE hour); and
- meet one of the acceptable format types (see below).

Format Types

Live Activity

Live activities are those in which the instructor or presenter is engaged in conducting the activity in the presence – physical or virtual – of the learners. Examples include courses, workshops, seminars, live webinars or teleconferences, and conferences. For activities with multiple “break-out” sessions, each individual session, rather than the activity as a whole, should be reported. Time spent taking an assessment, such as an examination, may not be included when reporting credit.

Self-Study Activity

Self-study activities are those in which the learner is consuming content that was previously presented, recorded, or otherwise delivered, or those for which the learner is engaged without the aid of an instructor. Examples include pre-recorded audio and/or video and self-paced online courses.

Recordkeeping and Audit

Documentation of programs must be maintained for a minimum of one year following the reporting of the program attendance by the Provider. Fi360 reserves the right to audit CE reported for accepted programs. In such cases, Providers will have thirty (30) calendar days to respond with the requested documentation. Documentation may include a grade report, transcript, or certificate of attendance or completion from the Provider, and at a minimum, should include: the participant’s name, activity name, activity provider, date of attendance or completion, number of CE credits, and a signature from a representative of the Provider.

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Unsupported or fraudulent reporting of program attendance may result in revocation or suspension of Provider status, or other sanctions.

Activity Topics:

CE activities should fall under one or more topics related to the Training curriculum. For activities with multiple topics, the portion pertaining to an acceptable topic(s) may be reported (e.g., three hours of CE may be derived from a six-hour, multitopic activity).

The following activities are generally not accepted: self-published works, team building, motivational, activities without proof of attendance/completion, self-study programs without a successful exam/quiz score, day-to-day business activities, sales or specific company or product presentations and reading a book or article.

Acceptable topics

Step One: Organize

Practice 1.1 – Demonstrate an awareness of fiduciary duties and responsibilities.

1.1.1 The Investment Advisor complies with all laws and rules that apply to the services the Advisor is providing.

1.1.2 The Investment Advisor complies with all applicable Practices and Procedures defined in this Prudent Practices handbook.

1.1.3 The Investment Advisor adheres to all applicable standards of conduct and code(s) of ethics required by law, regulation, employers, and professional organizations.

Practice 1.2 – Provide investments and investment services consistent with governing documents.

1.2.1 Investments are managed, and investment services are provided, in accordance with governing documents, including documents establishing the terms of an account or client engagement and the investment policy statement.

1.2.2 Documents pertaining to the investment management process, including records of decisions made by fiduciaries and clients, are secure and readily and reliably accessible by authorized persons.

Practice 1.3 – Document the roles and responsibilities of all involved parties, whether fiduciaries or non-fiduciaries.

1.3.1 All involved parties have acknowledged their roles and responsibilities and fiduciary or non-fiduciary status in writing.

1.3.2 Each investment committee formed, controlled, or required by the Investment Advisor has a defined set of by-laws or operating procedures to which the committee adheres.

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Practice 1.4 – Identify, then avoid or manage, material conflicts of interest in a manner consistent with the duty of loyalty.

1.4.1 Policies and procedures for overseeing and managing conflicts of interest, including to avoid self-dealing and making false or misleading statements, are defined and followed.

1.4.2 Conflicts of interest are avoided when prohibited by law and/or governing documents.

1.4.3 Conflicts of interest that are not avoided must be managed in the client's best interest.

1.4.4 Conflicts of interest that are not avoided must be disclosed to the client and informed client consent must be obtained.

Practice 1.5 – Execute written agreements that are consistent with fiduciary obligations.

1.5.1 The Investment Advisor fully discloses in writing all compensation arrangements and affiliations associated with the service agreement.

1.5.2 If the Investment Advisor is responsible for oversight of other service providers, the advisor must evaluate all material compensation, affiliations, and the fiduciary status of each service provider.

1.5.3 Agreements are periodically reviewed to ensure consistency with the needs of the client.

1.5.4 Comparative reviews of service agreements for which the Investment Advisor is responsible are conducted and documented approximately every three years.

Practice 1.6 – Prudently protect sensitive personal identifying information and assets of clients from theft, embezzlement, business disruption, and cybersecurity risks.

1.6.1 The Investment Advisor has a reasonable basis to believe assets are within the jurisdiction of a viable judicial system.

1.6.2 Appropriate procedures are in place to secure and prudently protect the privacy of client or plan data.

1.6.3 Appropriate procedures are in place to assure that sensitive personal identifying information and assets of clients are prudently protected from physical, operational and other material risks associated with business disruptions.

1.6.4 The Investment Advisor has a reasonable basis to believe assets are protected by appropriate insurance, bonding, internal controls, and security measures taken by fiduciaries and other service providers, including the Investment Advisor's own firm.

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1.6.5 The Investment Advisor has procedures in place to manage situations where the advisor reasonably believes that a client's assets are at risk due to suspicious behavior by service providers, the client, or others with access to or influence over the client's assets.

1.6.6 The Investment Advisor has documented a succession plan and a business continuity plan that is reviewed and tested periodically.

Step Two: Formalize

Practice 2.1 – Identify an investment time horizon for each investment objective of the client.

2.1.1 Sources, timing, distribution, and uses of cash flows are documented.

2.1.2 In the case of a retail investor, an appropriate needs-based analysis has been factored into the time horizon.

2.1.3 In the case of a defined benefit retirement plan, an appropriate asset/liability study has been factored into the time horizon.

2.1.4 In the case of a defined contribution retirement plan, the investment options provide for a reasonable range of participant time horizons.

2.1.5 In the case of a foundation or endowment, a schedule of expected receipts and disbursements of gifts and grants has been factored into the time horizon to the extent possible and an estimated equilibrium spending rate has been established.

Practice 2.2 – Identify an appropriate risk level for the portfolio.

2.2.1 The expected volatility of the portfolio is understood by the Investment Advisor and communicated to the client, and the quantitative and qualitative factors that were considered are documented.

2.2.2 "Large loss" scenarios have been identified and considered in establishing the portfolio's risk tolerance level.

2.2.3 Expected disbursement obligations and contingency plans have been considered when establishing liquidity requirements for the portfolio and assessing the capacity to assume portfolio risk.

2.2.4 In the case of a defined contribution retirement plan, the investment options provide for a reasonable range of participant risk tolerance levels.

Practice 2.3 – Evaluate the distribution of projected portfolio returns in the context of the client's risk and return objectives.

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2.3.1 The projected portfolio return is consistent with the client's tolerance and capacity to assume risk and investment goals and objectives.

2.3.2 Projected return assumptions for each asset class are based on reasonable risk premium assumptions.

2.3.3 For defined benefit plans, the projected return values used for modeling are reasonable and are also used for actuarial calculations.

2.3.4 For defined contribution plans, the projected returns for pre-diversified options, such as target date funds or model portfolios, are based on reasonable risk premium assumptions.

2.3.5 For endowments and foundations, the projected return values used for modeling are reasonable and are consistent with distribution requirements or the projected equilibrium spending rate.

Practice 2.4 – Ensure that selected asset classes are consistent with the time horizon and risk and return objectives for the portfolio.

2.4.1 Assets are appropriately diversified to conform to the portfolio's specified time horizon and risk/return profile and to reduce uncompensated risk.

2.4.2 For participant-directed plans, selected asset classes provide each participant the ability to diversify their portfolio appropriately given their time horizon and risk/return profile.

2.4.3 The methodology and tools used to establish appropriate portfolio diversification are prudent and consistently applied.

Practices 2.5 – Ensure that selected asset classes are consistent with implementation and monitoring constraints.

2.5.1 The Investment Advisor has the time, resources, knowledge, and skills to implement and monitor all selected asset classes.

2.5.2 The process and tools used to implement and monitor investments in the selected asset classes are appropriate.

2.5.3 Appropriate investment products are accessible within each selected asset class.

Practice 2.6 – Confirm that the investment policy statement contains sufficient detail to define, implement, and monitor the portfolio's investment and distribution strategies.

2.6.1 The investment policy statement identifies the bodies of law governing the portfolio.

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2.6.2 The investment policy statement defines the duties and responsibilities of all parties involved.

2.6.3 The investment policy statement specifies risk, return, and time horizon parameters.

2.6.4 The investment policy statement defines diversification and rebalancing guidelines consistent with risk, return, and time horizon parameters.

2.6.5 The investment policy statement defines due diligence criteria for selecting investment options.

2.6.6 The investment policy statement defines procedures for controlling and accounting for investment expenses.

2.6.7 The investment policy statement defines monitoring criteria.

Practice 2.7 – Apply environmental, social, and governance (ESG) factors to investment due diligence in conformity to law, regulations, governing documents and the fiduciary obligations of investment decision-makers.

2.7.1 The client's goals, objectives, and investment parameters are evaluated to determine whether ESG investing is necessary and/or desirable.

2.7.2 Provisions regarding ESG investing in governing documents are aligned with fiduciary obligations.

Step Three: Monitor

Practice 3.1 – Follow a prudent due diligence process to select each service provider and specific products and services.

3.1.1 Prudent criteria are identified for each due diligence process used to select service providers.

3.1.2 The due diligence process used to select each service provider is documented.

3.1.3 Each due diligence process used to select service providers is consistently applied.

Practice 3.2 – Implement statutory or regulatory investment safe harbors in compliance with the applicable provisions.

3.2.1 Available safe harbors are evaluated to determine if any advance the best interests of the investors and/or beneficiaries.

3.2.2 When elected, safe harbor provisions are implemented in compliance with requirements.

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Practice 3.3 – Make and document decisions regarding investment strategies and types of investments in accordance with fiduciary obligations.

3.3.1 A prudent due diligence process is used to select investment strategies, Investment Managers, and investments.

3.3.2 Decisions regarding the selection of investments consider both qualitative and quantitative criteria.

3.3.3 The due diligence process used to select investment strategies, Investment Managers, and investments is documented and consistently applied.

3.3.4 Regulated investments are preferred over unregulated investments when all other characteristics are comparable.

3.3.5 Investments that are covered by readily available data sources are preferred over similar investments for which limited coverage is available when all other characteristics are comparable.

3.3.6 A prudent due diligence process is used to make decisions regarding the use of proprietary versus non-proprietary products, and separately managed versus commingled accounts.

3.3.7 Decisions regarding rollover advice are made in accordance with fiduciary duties of loyalty and care.

Step Four: Monitor

Practice 4.1 - Conduct periodic reviews of investment performance against appropriate market and peer group benchmarks, and overall objectives for the portfolio.

4.1.1 Investment performance of the overall portfolio is compared against an appropriate benchmark and evaluated in the context of portfolio objectives.

4.1.2 The performance of each investment option is periodically compared against an appropriate market and peer group benchmark and any other performance-related due diligence criteria defined in the investment policy statement.

4.1.3 Underperforming investments are monitored and decisions to retain or replace investments are documented.

4.1.4 Rebalancing procedures are reasonable, documented, and consistently applied.

4.1.5 Investment performance is periodically reported to the client.

Practice 4.2 – Conduct periodic reviews of qualitative and/or organizational changes of investment managers and other service providers.

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4.2.1 Periodic evaluations of the qualitative factors that may impact the results or reliability of Investment Managers are performed.

4.2.2 Negative news and other material information regarding an Investment Manager or other service provider are considered and acted on in a timely manner.

4.2.3 Deliberations and decisions regarding the retention or dismissal of Investment Managers and other service providers are documented.

4.2.4 Qualitative factors that may impact service providers are considered in the contract review process.

Practice 4.3 – Conduct periodic reviews of policies for trading practices and proxy voting.

4.3.1 Procedures are in place to periodically review each Investment Manager's policies for best execution.

4.3.2 Procedures are in place to periodically review each Investment Manager's policies for special trading practices such as "soft dollars", directed brokerage, and commission recapture.

4.3.3 Procedures are in place to periodically review each Investment Manager's policies for proxy voting.

Practice 4.4 – Conduct periodic reviews to ensure that investment-related fees, compensation, and expenses are fair and reasonable for the services provided.

4.4.1 A summary of all parties being compensated from client portfolios or from plan or trust assets, and the amount of compensation, has been documented.

4.4.2 Fees, compensation, and expenses paid from client portfolios or from plan or trust assets are periodically reviewed to ensure consistency with all applicable laws, regulations, policies and procedures, and service agreements.

4.4.3 Procedures are in place to avoid or identify and appropriately address unreasonable fees.

Practice 4.5 – Conduct periodic reviews of the organization's effectiveness in meeting its fiduciary responsibilities.

4.5.1 Fiduciary assessments are conducted at planned intervals to determine whether appropriate policies and procedures are in place to address all fiduciary obligations and that such policies and procedures are effectively implemented and maintained.

4.5.2 The investment policy statement is reviewed at least annually to ensure it is aligned with current facts and circumstances.

Only 2 Practice Management hours may be reported per reporting cycle.

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