

# SEI's Operations Guide for Mutual Fund and Managed Account Solutions.

Service and Operations of SEI Private Trust Company for the SEI Wealth Platform<sup>™</sup> Advisory Clients

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# Disclosures.

Custody services are provided by SEI Private Trust Company ("SPTC"), a limited-purpose federally registered savings association. Certain services described herein are provided through SEI Investments Management Corporation ("SIMC") a federally registered investment advisor. SPTC, SIMC and other affiliates of SEI providing services within Independent Advisor Solutions by SEI are collectively referred to in this Operations Guide for Mutual Fund and Managed Account Solutions ("Guide") as SEI ("SEI").

The firms understand and acknowledge that SPTC is a custodian and not a Broker-dealer. SPTC participates in trading activity and acts as agent on behalf of the Investors, in each case in connection with its customary custody and safekeeping activities as an accommodation to Investors.

As a federally-chartered limited purpose savings association, SPTC has the authority to provide custody services in either a fiduciary or non-fiduciary capacity. Any fiduciary activities of SPTC must be conducted in compliance with 12 C.F.R. Part 150. SPTC also has the authority to act as a non-fiduciary custodian under 12 U.S.C. § 1464 and relevant OCC regulations. With respect to trading, because SPTC serves only as custodian with no investment discretion for the Investors' custody accounts, SPTC will be viewed as acting as a non-fiduciary custodian, unless based on specific facts and circumstances SPTC is otherwise acting as a fiduciary for an Investor's account.

In performing its duties related to all trading, SPTC also relies on an exemption from being a broker found in Section 3(a)(4) (B) of the Exchange Act and Regulation R for its safekeeping and custody activities.<sup>1</sup> Under this exemption, SPTC, as part of its customary activities in connection with safekeeping and custody, accepts orders to effect transactions in securities for a custody account done only as an accommodation to the Investor. To rely on the exemption for custody and safekeeping activities, SPTC must comply with certain requirements, such as certain restrictions on compensation received by SPTC employees, fees charged or received by SPTC, and advertising and sales literature content, among others. In order to rely on the custody and safekeeping exemption under Regulation R, SPTC cannot provide investment advice or research with respect to an Investor's account.

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**SEI Integrated Cash Program:** When an account is opened at SPTC it is automatically enrolled in the SEI Integrated Cash Program (the "Program"), a cash sweep program. In this Guide and SPTC documentation, which shall include but not be limited to, account open applications, guides and forms, amounts allocated to the Program will be referred to as "the SEI Integrated Cash Program" and/or "Cash and Cash Equivalent."

The Program has two tiers. Generally, the first 1% of an eligible investor account's value will sweep into FDIC insured deposit accounts ("Insured Deposit Cash") and cash balances above 1% will sweep into Sweep Class shares of the SEI Daily Income Trust Government Fund, a money market mutual fund (the "SEI MMF"). An investor cannot opt out of the Program. The Program is described in detail in the SPTC Integrated Cash Program Disclosure Document which is available online at seic. com/InsuredDepositCash.

**Note for 403(b) Accounts Only:** Custodial Accounts established under Internal Revenue Code Section 403(b)(7) will be excluded from participating in the Program and will be allocated entirely to an SEI money market mutual fund.

<sup>&</sup>lt;sup>1</sup> 12 C.F.R. § 218.760(b). Depending on specific facts and circumstances, it may also be possible that SPTC could rely on an alternative exemption from being a broker, for instance if SPTC accepts orders solely to effect transactions in securities for employee benefit plan accounts or similar accounts where it acts as custodian, or if SPTC effects transactions in a trustee or similar fiduciary capacity, in each case subject to certain limitations. See id. at § 218.760(a); 15 U.S.C. § 78c(a)(4)(B)(ii)).

# Working with SEI private trust company.

### How investment advisors work with SEI private trust company

Advisors are serviced by one of SEI Private Trust Company's (SPTC) Service Teams. Each team is committed to meeting your operational and administrative needs. **SPTC recommends that you contact your assigned Service Team prior to the establishment of your first account in order to review SPTC's policies and procedures. Please call 800-SEI-1003, and select option 1. Our telephone system will identify the area code from which you are calling and route your call to the appropriate service team.** 

### **Caller verification**

As part of SEI's ongoing effort to adhere to the privacy provisions of the Gramm-Leach-Bliley Act, we have implemented additional measures to protect your data, as well as the data of Investors, during phone calls. Please call **800-SEI-1003**, enter the last five digits of your **SEIAdvisorCenter. com** User ID, then enter the last four digits of your Taxpayer Identification Number (TIN). Once we validate your identifying information, select option 1.

Our telephone system will identify your firm information and route your call to the appropriate service team.

**Note:** All calls to and from SPTC's service teams will be recorded for quality assurance purposes

### **Hours of operation**

SPTC Service Teams are available from 8:30 a.m. to 7 p.m. Eastern time.

## Holidays and early closing

In cases where the New York Stock Exchange and/or Federal Reserve are closed, SPTC may be closed. If the Stock Exchange closes early or suspends trading, SPTC may institute abbreviated processing hours without advance notification. When this occurs, transaction guidelines may be altered. Please contact your Service Team for further details.

# **Opening an account**.

# Requirements to document your relationship with the investor

- Investor must sign your firm's investment agreement for asset-based investment services.
- You must forward a copy of your firm's ADV Part 2 and fee package to the Investor.
- (Optional) Have the Investor sign an Investment Policy Statement (available in the Proposal Builder) for the appropriate strategy selected by you and the Investor. This describes the strategy, the underlying mutual funds, and the objectives of the strategy. The Investment Policy Statement is for Advisor and Investor use only and is not required to be sent to SPTC.
- You must provide the Investor with the SEI Consumer Privacy Notice (which is included in the Forms kits).

# How to begin doing business with SPTC

All Advisors must successfully complete the due diligence process prior to doing business with SEI. Your registered investment advisor firm ("firm") must complete an SEI Program Agreement to establish a selling agreement with SEI. When providing instructions to SPTC you must use the appropriate SPTC forms.

# How to work more efficiently with SPTC

- Always use SPTC forms; access them, and submit them electronically, via SEIAdvisorCenter.com by selecting Actions>Manage Forms.
- Reference account numbers on transaction requests.
- Use only one account number per transaction request.
- Many transactions can be initiated through
   SEIAdvisorCenter.com as self-service transactions
   (subject to Broker-dealer approval and firm-approved user
   entitlements). When processing a self-service transaction,
   be aware of balances and pending activities within the
   account(s).
- Refrain from submitting duplicate paperwork for the same request.
- Make checks payable to SPTC.
- Furnish proper signatures on all forms.
- For additional assistance and resources, click on the ? on the task bar on the **SEIAdvisorCenter.com** home page for the Tour Page and Help Menu.
- Have your **SEIAdvisorCenter.com** User ID and account information available when calling SPTC.
- Review all confirms and statements as soon as you receive them.
- Use this Guide.

### **Delivery instructions**

Transaction requests submitted electronically via **SEIAdvisorCenter.com**, mailed to SPTC at the address listed below or faxed to 610-676-1021 will be processed in accordance with the schedule listed under Processing Cutoff Times, provided the request contains complete and clear instructions and is documented on an SPTC form. It is important for you to ensure that all requests contain the appropriate signatures and account number(s). If SPTC requires additional information to complete a transaction, every effort will be made to contact you by telephone or email. The transaction will then be processed in line with our normal guidelines.

#### SPTC

ATTN: Independent Advisor Solutions by SEI (Service Team) P.O. Box 1098 Oaks, PA 19456-9907

(for overnight delivery)

#### SPTC

ATTN: Independent Advisor Solutions by SEI (Service Team) One Freedom Valley Drive Oaks, PA 19456

### **Identity theft**

In accordance with Section 114 of the Fair and Accurate Credit Transaction Act of 2003, SPTC has established an identity theft program. If the Investor is a victim of identity theft and wishes to restrict his/her SPTC account, please call **800-SEI-1003** and ask a service representative for details.

### **Electronic signatures**

Many forms are eligible to be electronically signed through DocuSign based on your firm-approved user entitlements. Please note that if an account is opened using SPTC's electronic signature offering, all subsequent requests for that account requiring an Investor signature must be submitted through our electronic signature offering unless a valid Signature Card is on file at SPTC. Please refer to the "Electronic Signature through DocuSign" document available on **SEIAdvisorCenter.com**. Contact your firm or Broker-dealer to determine whether you are able to use the electronic signature offering with your Investors.

### USA Patriot Act and Anti-Money Laundering (AML) regulations

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means to you: When an Investor opens an account, SPTC will ask for the Investor's name, address, date of birth, Social Security number, or Taxpayer Identification number, and other information that will allow us to identify the Investor. This information will be verified to ensure the identity of all persons opening an account. In certain circumstances, SPTC is required to collect documents to fulfill our legal obligation. Documents provided in connection with the Investor's application will be used solely to establish and verify the Investor's identity, and SPTC shall have no obligation with respect to the terms of any such document.

# Paperwork requirements.

#### • = Submit electronically via SEIAdvisorCenter.com

	Non-IRA Account Application	IRA Account Application	SIMPLE IRA Account Application	Plan	403(b)(7) Account Application and, if required, Information Sharing Agreement	Trustee Certification	Corporate/ Organization/ Partnership Resolution	Letter of Testamentary/ Short Certificate	Certification of Controlling Party and Beneficial Owner(s)	Form 5500 or Signed Plan Document
Account registrations	5									
Individual	•									
Joint Tenants	•									
Tenants by Entirety	•									
Tenants in Common	•									
Community Property	•									
Trust Account <sup>1</sup>	•					•				
401(k) (including Owner Only Solo 401(k))				٠						•
Defined Benefit				•						•
Profit Sharing Plan				•						•
Money Purchase Plan				•						•
UTMA/UGMA	•									
IRA		•								
SIMPLE IRA			•							
Estate	•							•		
403(b)(7)					•					
Corporation/ Partnership	•						•		•	
Endowment/ Foundation	•						•		•	
Guardian/ Conservator <sup>2</sup>	•									
Sole Proprietorship	•						٠		٠	
Tax Exempt and Non-Profi	t •						•		•	

**Note:** Please see Account Application for detailed additional information and documentation that may be required before submitting an application.

<sup>1</sup>The trust accounts referenced above are relevant only where SPTC is the custodian. Please contact the Personal Trust Services Group for further information regarding other accounts where SPTC is being asked to act as Trustee (see RESOURCE GUIDE for Contact Information).

<sup>2</sup>Please use appropriate Account Application and refer to the ACCOUNT REGISTRATION section for further information on Guardianship accounts.

# Signature requirements.

#### • = Signature required

	Social Security Number (SSN)/Tax Identification Number (TIN) Required	Owner	Joint owners	Advisor	Trustees	Plan sponsor	Plan trustee	Custodian <sup>2</sup>	Guardian/ Conservator	Personal representative	Employer	Authorized officer of the company or trustee	Authorized Officer/ Partner
Account type													
Individual/IRA	Individual's												
Joint Tenants	All owners	•		•									
Tenants by Entirety	All owners		٠	٠									
Tenants in Common	All owners		•	•									
Community Property	All owners		•	٠									
Trust Account <sup>1</sup>	SSN/TIN		•	٠	٠								
401(k)	TIN <sup>3</sup>			٠		•	•						
Defined Benefit	TIN <sup>3</sup>			•		•	•						
Profit Sharing Plan	TIN <sup>3</sup>			•		•	•						
Money Purchase Plan	TIN <sup>3</sup>			٠		٠	٠						
UTMA/UGMA	Minor's and custodian's			٠				•					
Estate	Estate TIN and executor/ executrix SSN			•						•			
403(b)(7)	Employee's	•		•							٠		
Corporation/ Partnership	TIN			٠									•
Endowment/ Foundation	TIN of organization			•								٠	
Guardian/ Conservator	Principal's and guardian's/ conservator's			•					•				

**Note:** Please submit complete Account Applications with all requested information and signatures. See Account Application for detailed additional information and documentation that may be required before submitting an application. If the required information is not provided, the account will not be opened and any initial funding will not be invested until information has been received. Should this occur, SPTC will contact the Advisor by phone or email. If the information is not received within the required time frame, the application and any funding will be returned.

<sup>1</sup>For Revocable Trusts, the grantor's TIN must be used for tax-reporting purposes. For Irrevocable Trusts, the TIN of the trust must be used for tax-reporting purposes.

<sup>2</sup>UGMA and UTMA require an adult or trustee to act as custodian for a minor (beneficial owner).

<sup>3</sup>If this is an Owner Only plan, the plan participant must provide his/her SSN in addition to the plan TIN.

# **Account Registration**.

### **Guardianship accounts**

• The applicable Non-IRA Account Application or IRA Account Application must be signed by the guardian/conservator and Advisor. The guardian/conservator and Advisor must also submit a court order certified by court clerk.

# Minimum age to open an account with SPTC

• UTMAs, UGMAs and all IRA types are able to be opened by minors as long as the minor has a valid custodian under his/ her state's law (typically parent, guardian or trustee). All other individuals opening an SPTC account must be the age of majority. The age of majority is typically 18 although may vary from state to state.

### UGMA/UTMA (Uniform Gifts to Minors Act/Uniform Transfers to Minors Act)

- The Account Application must indicate the state in which the UGMA/UTMA is established.
- The UGMA/UTMA custodian (typically parent or trustee) has several fiduciary responsibilities under UGMA/UTMA statutes, but SPTC is not a party to the fiduciary relationship between the custodian and the minor.
- The custodian of an UGMA/UTMA (not SPTC) is responsible for complying with the applicable state laws.
- UGMA/UTMA accounts cannot be pledged as collateral for a loan.
- Once a minor reaches the age of majority, contact SPTC to find out how to re-register the account. SPTC does not monitor for Investors reaching the age of majority.

## **Additional services**

- Pledged Accounts
- Power of Attorney
- Transfer on Death
- Change of Ownership

#### Pledged accounts

A completed SPTC Account Control Agreement must be used when pledging accounts as collateral. Third-party control agreements are not acceptable. When pledging accounts as collateral for the Bancorp Bank or Nationwide Smart Credit/ Supernova, please follow their respective digital SBLOC application process.

**Note:** IRA accounts, 403(b)(7) accounts, accounts in which SPTC is named either as a trustee or a directed trustee, as defined by Employee Retirement Income Security Act (ERISA), and accounts in which SPTC acts as a fiduciary (Personal Trust accounts) may not be pledged.

#### Termination of pledge agreement

If the Investor has paid off or defaulted on the loan:

- The lender must notify SPTC in writing, on bank letterhead, that it is requesting redemption of the account or termination of the pledge.
- The authorized bank officer's signature must be guaranteed.

#### Power of attorney (POA)

Supply an Agent Authorization Form (and original completed Account Application if the account has not yet been established) with the principal's TIN, appropriate signatures, notarization, and a copy of the power of attorney if applicable. An Agent Authorization Form can only be submitted for certain account types. Applicable state law determines the validity and construction of a power of attorney.

- If the principal is able to act, an Agent Authorization Form must be signed by the principal(s) and agent(s).
- If the principal is unable to act, an Agent Authorization Form, signed by the agent, must be submitted with a copy of the Durable Power of Attorney.

#### Transfer on death

The transfer-on-death option allows Investors utilizing an individual, Joint Tenants with Right of Survivorship or Tenants by Entirety (not available in all states) account registration to establish beneficiaries for the SPTC account. A Transfer on Death (TOD) Beneficiary Designation Change/Termination Form (and Account Application if the account has not yet been established) signed by all Investors must be submitted.

### Change of ownership

Due to anti-money laundering regulations, any change of ownership or registration with a different TIN will be processed by moving the assets to a new account number. Anytime a new account is established, new account opening documentation is required. Please refer to the Paperwork Requirements section. Note: In the following circumstances an **Account Registration Change Form** should be used rather than an Account Application.

- The TIN on the account is changing from one spousal joint owner's to the other spousal joint owner's. If the spousal joint owner has account(s) already established, SPTC may need to assign a new account number.
- A joint owner is being removed from the account (i.e., account is changing from a joint account to an individual account)

# Account application process.

# Opening and funding multiple strategies with a single application

A self-service "Open New Account" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements). Or, the applicable Account Application can be submitted electronically via **SEIAdvisorCenter.com**.

The initial funding of the Mutual Fund account will be defined by the percentage or dollar amounts indicated in the investment instructions sections of the Account Application. Please note that when the account is being funded via inkind transfer, SEI will not automatically liquidate or allocate incoming assets.

Assets being transferred in-kind into Managed Account Solutions accounts will automatically be placed into the Asset Transit portfolio and invested according to the investment instructions submitted on the Account Application (or, for assets being transferred after the initial funding has taken place, per further instructions submitted separately by the Advisor); assets being transferred in-kind into a Distribution Focused Strategy account will automatically be placed into the strategy. For more information, see the "Managed Account Solutions" section of this Guide.

After initial funding, all future monies should be sent with an Additional Investment Form instructing SPTC how the funds should be invested; if no instructions are received by SPTC, funds will be allocated according to the strategy or, if the account has no strategy, left in cash. Any additional in-kind assets following first funding will be placed in the Asset Transit portfolio.

#### Adding a portfolio or overlay to an account

Accounts on the SEI Wealth Platform can be comprised of multiple portfolios including, but not limited to, SEI Strategy, DCA, Holding Money Market, Advisor-Guided and Client-Directed portfolios. Accounts can also have an overlay that "lays over" the top of multiple portfolios within the account; the overlay allows cash to be invested or raised across portfolios by way of a Transitory Cash portfolio. All Managed Accounts automatically have an overlay created; to create a non-managed portfolio on a Managed Account, use the Managed Accounts Solutions: Portfolio Creation Form. The self-service "Modify Investment Assignment" action, available on SEIAdvisorCenter.com, can be used to add an Advisor-Guided, Holding Money Market or Client-Directed portfolio. Or, the Portfolio/Overlay Creation and Maintenance Form should be used to create or modify a portfolio or overlay on a Mutual Fund account.

# Firm changes.

#### Changes of registered investment advisory firm

If you are creating a new registered investment advisory (RIA) firm an SPTC Program Agreement will need to be completed in order to establish the new RIA.

If you change your RIA affiliation by joining an existing or newly established RIA firm with SPTC and wish to move your current client accounts to your new RIA firm, client-signed Advisor and/ or Broker-dealer Change Forms will need to be submitted to SPTC in order for the changes to be made.

- If the change occurs within the first 10 business days of the beginning of the fee payment period, all advisory fees will be paid to the new firm. If the change occurs within the last 10 business days of the fee payment period, all fees will be paid to the old firm.
- If the change does not occur within the first or last 10 business days of the fee payment period, all advisory fees will be paid out pro rata based on the later of (1) the date of receipt by SPTC of the required signed end-client form agreeing to the change and (2) the date of completion of due diligence required by SEI.

# Changes of Broker-dealer (and not registered investment Advisor firm)

If the RIA firm changes its Broker-dealer to whom fees were being paid (and the RIA firm is not changing) and the change does not occur within the first or last 10 business days of the fee payment period, advisory fees for the period will be paid out pro rata to the old and new Broker-dealer based on the later of (1) the date of receipt of the required signed form by SPTC and (2) the date of completion of due diligence required by SEI.

If the change occurs within the first 10 business days of the beginning of the fee payment period, all fees will be paid to the new Broker-dealer. If the change occurs within the last 10 business days of the end of the quarter all fees will be paid to the old Broker-dealer.

# Password management.

# Password management including revoking access to SEI systems

#### Passwords changes or forgotten passwords

In the event a user needs to change his/her password or has forgotten the password to log on to any SEI website, there are two ways by which the password can be reset:

The user has the ability to reset the password themselves on the website. It requires the user to answer security questions in order to authenticate who he/she is for security purposes first, and then allows the user to change the password.

The user can call the SEI Technical Support number (800-SEI-1003, option 4 then option 1) and speak to an agent to have a password changed or reset if forgotten. The user will be asked questions by the SEI agent for security purposes first to ensure proper authentication, and then the password will be changed or reset. Revoking access to SEI systems—termination of employees, employees who change firms, or employees of firm or affiliated Broker-dealer users of firm no longer allowed access to SEI systems

When an employee of an Advisor Firm or affiliated Brokerdealer user is either terminated, changes firm or Broker-dealer, or needs to have their user id and password revoked for any reason the firm must submit to SEI the **SEI Wealth Platform User Registration/Change Form** or a Letter of Instruction on the firm letterhead signed by an authorized signer.

# Transaction guidelines.

# Multiple/Bulk requests (more than 25 items)

Many transactions can be completed more quickly via selfservice on **SEIAdvisorCenter.com**. A bulk request process, however, is in place for any request of more than 25 trades, accounts or tax lots. Contact your Service Team to discuss the most efficient way to handle your request. Your firm must complete the following steps for the bulk request order to be considered "in good order."

- 1. Obtain the Bulk Request Form.
- 2. Contact your Service Team to notify them of an impending bulk trade.
- 3. Fax the completed Bulk Request Form to **610-676-1021** and email a spreadsheet (Excel format only) that includes the pertinent information from the example below to **BulkTradeRequests@seic.com**.

SPTC must receive the completed faxed Bulk Request Form and emailed Excel spreadsheet in good order no later than 2:30 p.m. Eastern time to receive next business day processing. If a request is received before 2:30 p.m. Eastern time but not in good order, time permitting, we will assist your firm in bringing your request into good order as quickly as practicable with the goal of getting your bulk request order processed the next business day.

Some two-step bulk request orders (i.e., a bulk order that involves both a sale and a purchase) may take more than one day to execute and therefore the sale and purchase may have different trade dates.

Submitting multiple requests for the same account(s) may cause processing delays.

Please refrain from submitting duplicate paperwork for the same request and from submitting further monetary transactions for the accounts included in the bulk request until all of those trades have been completed.

## **Quarterly rebalancing**

**Strategy Rebalancing**: Unless otherwise communicated, quarterly rebalancing will occur each quarter in the months of January, April, July, and October. Exact dates can be found in the help menu of **SEIAdvisorCenter.com**. Every account invested in an SEI strategy or a custom strategy that rebalances is evaluated with respect to the target allocation for each fund in that strategy. Any fund whose allocation differs from the target allocation by at least 2% for SEI strategies (3% for SEI Tax-Managed strategies) or, for custom strategies, any fund whose allocation differs from the target allocation and upper/lower tolerance(s), is identified. Each deviating fund is then purchased or sold to return the allocation within the target level, +/- the variance, with the following business day's trade date.

**Overlay Rebalancing**: If an account is set up with an overlay and rebalancing is turned on, it will rebalance based on the target allocation and upper/lower tolerances set during creation.

For Managed Strategy rebalancing information, please refer to the Managed Account Solutions portion of this Guide.

**Note:** Quarterly, during strategy/overlay rebalancing, Cash and Cash Equivalent in the portfolio may be realigned. If your account isn't invested in a rebalancing strategy (e.g. SEI, firm custom, or managed strategy), there will be no realignment to Cash and Equivalents – as such, no securities or non-Program sweep money market mutual funds will be redeemed.

## Account (Liquidation) closings

- 1. Use the applicable Distribution Form; account closings cannot be processed online via self-service functionality.
- 2.A \$95 termination fee will be charged per account request for all accounts leaving SPTC. A balance of \$95 must remain in the account until the account is closed. If the distribution request will leave less than \$95 in the account, the amount distributed will be altered in order for the account to maintain a \$95 balance.

**Note:** Unless otherwise indicated, if the entire balance is requested, the account will be liquidated and closed. Proceeds, minus the \$95 termination fee and any other applicable fees, will be distributed as directed on the Distribution Form.

#### Example of bulk request spreadsheet

Account	Account Name	Asset Name	Ticket	CUSIP	Shares	Market Value	Sell All	Portfolio	Invest Proceeds
							Yes or No		

Advisors may opt to receive an account closing confirmation via email by making the appropriate selection on the Preferences page on **SEIAdvisorCenter.com**.

Accrued residuals (totaling \$5.00 or more) for the month in which the closing occurred will be sent in a separate payment the following month. The same method of delivery will be used.

Rejection letters will be sent via regular mail to the new custodian if the account closing paperwork does not include all the required information to process the distribution.

If the account is participating in the Automatic Deduction of Periodic Fees program and collects fees in arrears, the final prorated fee will be deducted from the account and transferred to the appropriate Broker-dealer or firm's fee clearing account. However, if the account is participating in the Automatic Deduction of Periodic Fees program and collects advisory fees in advance, a final prorated fee will be debited and transferred from the appropriate Broker-dealer or firm's fee clearing account and credited to the client's account. SPTC will not deduct or credit a final prorated fee if the funds from the account being closed are staying with the same Advisor at SPTC.

Once the closing process has begun, no trading may be done via self-service.

See the Cash Disbursements section for additional information.

A shell account is a temporary account established at SPTC for each beneficiary of an IRA, TOD or 403(b) account after the account owner has died and if the beneficiary requests a taxable distribution from his/her portion of the assets (transfers are not reportable). The shell account assists with reporting taxes under the beneficiary's SSN. Shell accounts are opened upon the receipt of an Inherited IRA Beneficiary Election Form or a Transfer on Death (TOD) Payment to Beneficiary Form, or a Distribution Form (403(b)(7)) with "Death Distribution" selected as the distribution reason.

### **Address changes**

- A self-service "Modify Contact Information" action is available on SEIAdvisorCenter.com (subject to Brokerdealer approval and firm-approved user entitlements). If your Broker-dealer requires a client's signature for an address change, submit an Address Change Form electronically via SEIAdvisorCenter.com.
- 2. If the "Modify Contact Information" action is utilized, the appropriate option must be selected in order to update the tax residency state. If the Investor is a resident of CA, MA, NJ, NY, or PA and is invested in a strategy that utilizes a state-specific municipal bond fund, submit a Strategy Change Form to make any applicable changes to the strategy. The submission of the Address Change Form will not automatically make the appropriate changes to a state-specific investment.

- 3. In order to provide increased security for our customers, SPTC will mail an address confirmation statement to the old and new addresses when an address of record is updated on an Investor's account. Address confirmation statements will not be mailed when a third party or Advisor address is updated.
- 4. The "Modify Contact Information" action can also be used to add or modify the Investor's email address and phone number or change the contact information for a third party account relationship (subject to Broker-dealer approval and firm-approved user entitlements).
- 5. If you are changing an address to a foreign address, contact your Service Team at **800-SEI-1003** to find out if additional information is required.
- 6. To update your email/mailing address, phone/fax number, assistant name/extension, or **SEIAdvisorCenter.com** access information, complete an Advisor Contact Information Change Form.

### **Asset liquidations and transfers**

#### Use the Liquidation/Cash Transfer Form

- 1. Within two business days of the date of receipt of the Liquidation/Cash Transfer Form, SPTC will forward a request letter, along with the form, to the current custodian via overnight mail. The appropriate street address must be listed and the Investor's original signature must be included. The Advisor will be contacted if the paperwork received is not in good order.
- 2. The dollar amount of the transfer must be listed on the form. If a percentage of assets is listed, please provide a current account statement of assets dated within the last six months. If a complete liquidation and transfer is requested, provide an approximate value of the account on the form.
- Five business days after the transfer is initiated, SPTC will contact the custodian to confirm receipt of the paperwork. The administrator will continue to contact the custodian every five business days until all assets are received at SPTC.

SPTC determines the appropriate circumstances under which involvement of the Advisor is necessary to expedite the transfer.

**Note:** Certain delivering custodians require that the Investor request liquidation of assets directly and will not accept liquidation instructions from SPTC. Please reference the Delivering Custodian Quick Reference Guide in the Help Menu on the home page of **SEIAdvisorCenter.com**.

It is the responsibility of the Advisor/Investor to determine if additional paperwork/instruction is required by the current custodian.

Investment instructions should not appear on the Liquidation/ Cash Transfer Form.

# Automatic Investment Program (AIP)

A self-service "Schedule Cash Receipt" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements) to establish, modify or delete an AIP to an IRA or Non-IRA account. Or, the applicable Automatic Investment Program (AIP) Form (IRA, Non-IRA or QP) can be submitted electronically via **SEIAdvisorCenter.com**.

Requests for a new AIP transaction to begin two business days after the receipt of the request must be received by SPTC by 2:30 p.m. Eastern time.

The AIP funds will be placed into Cash and Cash Equivalent on the second business day after the start/recurring date of the AIP.

- 1. If the portfolio into which the AIP is being invested utilizes a strategy, the funds will be invested into the strategy on the third business day (unless SPTC is instructed to leave them in Cash and Cash Equivalent
- 2. If the portfolio into which the AIP is being invested does not utilize a strategy, the funds will remain in Cash and Cash Equivalent or will be invested according to the firm's default invest cash method including investment into Non-SEI assets, if applicable, on the third business day.

- 3.SPTC will modify an AIP if an Automatic Investment Program (AIP) Form with updated information is received by 2:30 p.m. Eastern time at least two business days prior to the next date of the AIP.
- 4. If the AIP will cause an over-contribution to an IRA account, the AIP will be stopped for the remainder of the year before the over-contribution occurs; the AIP will resume the following year. If, as a result of the AIP being stopped, the Investor does not reach his/her maximum contribution limit, it is the advisor's responsibility to set up a new AIP/arrange for the client to remit the remaining amount to reach the maximum contribution limit, if desired.

## **Capital gain distributions**

- 1. Advisors are typically notified in October and again in November with capital gains estimates for SEI-issued mutual funds for the year.
- 2. Capital gain distributions are typically paid during the first or second week of December each year.

### **Cash disbursements**

**Note:** For Managed Strategy disbursements, please refer to the Cash Disbursements section in the Managed Account Solutions portion of this Guide.

- A self-service "Disburse Cash" action is available on SEIAdvisorCenter.com (subject to Broker-dealer approval and firm-approved user entitlements). Or, the applicable Distribution Form can be submitted electronically via SEIAdvisorCenter.com.
- 2. Refer to the disbursement information available in the Help Menu on the home page of **SEIAdvisorCenter.com** for additional information.
- 3. When a disbursement is requested via self-service and the account holds a sufficient balance in either Insured Deposit Cash or money market, it will be sent the same day, provided the request is approved (if applicable) before the respective cutoff times: 1:30 p.m. Eastern time for Insured Deposit Cash and 3:45 p.m. Eastern Time for money market. Requests for same day disbursements that are not submitted via self-service must be submitted by 11:00 a.m. Eastern time.

If a sufficient Cash and Cash Equivalent balance does not exist within the instructed portfolio and the request is received by 2:30 p.m. Eastern time, assets will be sold overweight if the portfolio utilizes a strategy and pro-rata across all mutual funds if the portfolio does not utilize a strategy. If a non-strategy portfolio does not hold enough mutual funds to satisfy the distribution request, cash will be raised pro-rata across the entire portfolio. Available Cash and Cash Equivalent will always be exhausted first. When exhausting Cash and Cash Equivalent, or raising cash across portfolios, money market balances will sweep out first and then Insured Deposit Cash will sweep out. Insured Deposit Cash is subject to intraday cutoff; it is set at 1:45 p.m. Eastern time. Distributions submitted via self-service must be received by 3:45 p.m. Eastern time for raise cash trades to be placed same day (note: some Non-SEI mutual funds have earlier cutoff times).

If the account is not funded as of the initial start date for a scheduled distribution, the first distribution will start on the next scheduled distribution date.

If an account does not have enough funds to cover a recurring distribution, the Investor must add money to the account to cover the distribution or provide SPTC with instructions to cancel the distribution. If funds are not received by the date of the scheduled distribution, the distribution will advance to the next scheduled distribution date.

If recurring distributions are to be taken from a specific fund or from a portfolio that does not utilize a strategy (including Holding Money Market) and the assets are not available in the designated fund/portfolio, SPTC will fund the distribution pro rata across all mutual funds. If there are not enough assets to process the distribution, the Advisor will be notified and required to either fund the distribution or provide additional instructions to raise the funds for the distribution. If no action is taken within five business days, SPTC will remove the distribution and the recurring event.

Provide recipient's street address, city, state and zip code for third-party distributions sent via wire or check.

See the Distribution Requirements Guide for information about signature requirements and specific distribution requirements due to divorce or death.

For signature information regarding self-service distributions, refer to the Pay To and Straight Through Eligible information on SEIAdvisorCenter.com. For non self-service distributions, the Advisor's signature is required for check distribution and account closing requests to the name and address of record; all other distribution and account closing requests, including distributions that are payable to an account owned by the Investor at another custodian or payable to a third party, must be signed by both the Investor (or, for qualified plan accounts, the Plan Sponsor or an authorized person designated by the Plan Sponsor) and the Advisor. A Standing Instructions Form may be submitted to allow an Advisor to authorize check, wire or ACH distributions to account(s) owned by the Investor(s); this form cannot be used for qualified plan accounts, 403(b)(7) accounts, Personal Trust accounts, accounts that are pledged to an outside institution, or accounts from which distributions/ withdrawals are restricted.

**Note:** A \$25 fee will be assessed to the Investor's account when a stop payment request is made.

#### Withholding (IRA Accounts Only)

SEI offers withholding options online at **SEIAdvisorCenter. com** when you elect to process your distribution via self-service.

#### • Federal tax withholding

Distributions from an Investor's Traditional, SIMPLE, SEP or Inherited Traditional IRA account are subject to a mandatory 10% withholding for federal tax. For newlycreated distributions, the Investor may indicate an amount to be withheld greater or less than 10%, in whole percentage increments, or choose to waive withholding. Inherited Roth IRA and most Roth IRA distributions are not subject to mandatory federal tax withholding; however, the Investor may choose to have federal taxes withheld as a whole percentage of the distribution.

#### • State tax withholding

SPTC is able to withhold state taxes on IRA distributions unless the Investor is a resident of the following states/ territories: AK, FL, HI, MP, NH, PR, SD, TN, TX, WA, and WY. Some states require state taxes to be withheld on IRA distributions by default and others allow it be voluntarily elected. A state's withholding automatically defaults to the state's minimum tax withholding requirement. You may withhold an amount that meets or exceeds your state's minimum or, if permitted, waive the defaulted amount directly online.

### **Travel rule procedures**

The "Travel Rule" is a common name for the Bank Secrecy Act rule 31 CFR 103.33(g). which requires all financial institutions to transmit specific information when an Investor moves from one financial institution to another. This rule was issued by the Treasury Department's Financial Crimes Enforcement Network and became effective May 28, 1996, but through a conditional exception granted in 1998, the requirements of the rule were relaxed due to computer programming burdens faced by financial institutions. This exception expired at the end of June and the rule became effective July 1, 2004. SPTC applies this rule to all transmittals of wires. The following specific information is required to "travel" with the wire transfer:

- Name of the Investor
- Account number of the Investor
- Address of the Investor
- Amount of the transmittal order

The following items received with the payment order should also be included:

- Name, address and account number of the person or entity that will receive the funds (recipient)
- Identity of the recipient beneficiary's financial institution

Checks and wires are included in the Travel Rule only when the Investor requests a check or wire to be sent payable to a financial institution for the benefit of a third party. SPTC's best practice is to include the transmitter and recipient name and address information in each wire transfer.

**Note:** When allocating to Cash and Cash Equivalent, or investing cash across portfolios, generally cash will sweep in to Insured Deposit Cash first and then will sweep to money market. Insured Deposit Cash has an intraday cutoff of 1:45 p.m. Eastern time.

### **Cash receipts**

**Note:** For Managed Strategy receipts, please refer to the Additional Investments section in the Managed Account Solutions portion of this Guide.

#### Use the applicable Additional Investment Form

Investing into a portfolio that utilizes a strategy

In the event a check, wire, lockbox or ACAT cash payment is received without investment instructions, the monies will be invested in the strategy on the account, per standard procedures. These standard procedures will be followed regardless of whether the account has DCA and/or Holding Money Market positions.

Investment instructions should not appear on the checks, wires or lockbox payments themselves. Instead, submit the applicable Additional Investment Form to indicate how the receipt should be invested.

# Investing into a portfolio that does not utilize a strategy

In the event a check, wire or lockbox payment is received without investment instructions, the monies will be placed in Cash and Cash Equivalent until further instructions are received. These standard procedures will be followed regardless of whether the account has DCA and/or Holding Money Market positions.

**Note:** For investments into a portfolio that does not utilize a strategy and holds just one GoalLink Fund, that Fund will be purchased on Day 1.

**Note:** When allocating to Cash and Cash Equivalent, or investing cash across portfolios, generally cash will sweep in to Insured Deposit Cash first and then will sweep to money market. Insured Deposit Cash has an intraday cutoff of 1:45 p.m. Eastern time.

**Fed Wires/Lockboxes**–Upon receipt of a wire or lockbox payment prior to 2 p.m. Eastern time, SPTC purchases a Cash and Cash Equivalent vehicle. Simultaneously, a "Cash Receipt" is posted to the Investor's account and mutual fund trades are placed in accordance with the current strategy. **Checks** – Checks should be made payable to SPTC, SEI Investments Company, SEI Private Trust Company, or the account registration. Checks made payable to any other party, including the advisory firm, will not be accepted. Upon receipt of a check prior to 12 p.m. Eastern time, SPTC purchases a Cash and Cash Equivalent vehicle. Simultaneously, a "Cash Receipt" is posted to the Investor's account and mutual fund trades are placed in accordance with the current strategy.

**Note:** For first funding, cash is swept into Cash and Cash Equivalent the next business day.

**Note:** SPTC will not accept the following forms of payment: cash, travelers checks, money orders or credit card checks.

**Note:** If an investment check is returned for the following reasons—stop payment, refer to maker, unauthorized signature, improper endorsement or insufficient funds —replacement funds must be received within 72 hours. If reimbursement funds are not received within a 72-hour time period, the sender, Advisor or Investor will assume any loss within the account. If the Advisor would like the loss paid outside the account, an indemnity agreement should be submitted to SPTC indicating who will assume the loss.

### **Cost basis**

Cost basis information often transfers with the assets within 30 days of the transfer. If it doesn't, however, it can be provided to SPTC by completing the Cost Basis Update Form. Please include the following information for each asset:

- Asset Name
- Tax Acquisition Dates
- Delivering Custodian
- CUSIP or Ticker Number
- Tax Acquisition Costs
- Number of Shares

If you are unable to provide tax cost basis and acquisition date information, the following will apply:

- Assets will be booked with a default tax acquisition cost and a default tax acquisition date of UNK (unknown).
- The integrity of the calculation provided on SPTC's Schedule D Tax Form will be compromised to the extent that SPTC is not provided with accurate or complete information.
- SPTC's Investor Statement for individual securities includes unrealized gain and loss information for each asset owned. If cost basis information is not provided, this calculation will be inaccurate.

**Note:** IRA accounts do not have cost basis, so cost basis information does not need to be provided for these accounts.

### **Custom strategies**

A self-service "Create Strategy" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements).

When a new custom strategy is created via the "Create Strategy" action and applied to SEI accounts using the "Modify Investment Assignment" action before 3:45 p.m., trades will receive a same-day trade date (subject to intra-day cutoff times).

SPTC may charge a fee to establish the custom strategy; there is no fee to establish a custom strategy via self-service.

If you are affiliated with a Broker-dealer, home office approval may be required prior to the establishment of a custom strategy. Please contact your Broker-dealer to determine if approval is necessary. If approval is necessary, submit the approval in the form of a letter (on Broker-dealer letterhead, signed by a principal).

When allocating funds for a custom strategy, note that if the variance elected for a specific fund is equal to or greater than the fund's target allocation, the variance for that fund will be set 0.01% less than the target allocation. If the Cash and Cash Equivalent variance elected is equal to or greater than the fund's target allocation, the variance for Cash and Cash Equivalent is set 0.5% less than the target allocation.

### **Dividends and interest**

Money market funds and fixed-income funds accrue income daily and pay dividends monthly on the first business day of the month. This dividend payment reflects income earned during the previous month. Dividends from fixed-income funds are reinvested into the fund unless otherwise instructed. Dividends from money market funds may only be reinvested; they may not be distributed. In contrast, Insured Deposit Cash also accrues daily income but pays interest, not dividends, on the first business day of the month. Unlike money market funds, income from deposit bank accounts may be distributed.

Equity funds do not accrue income daily. Rather, they have traditional ex-, record-, and payable- dates associated with them. These funds generally pay dividends quarterly or annually on the last business day of the quarter to holders of record. This payment is posted to Investors' accounts after the end of the quarter. During December, this payment is generally posted to Investors' accounts **prior** to the end of the quarter.

International funds generally pay dividends annually, typically during the last week of December.

Changes to the dividend treatment method should be submitted using the appropriate Monetary Change Form. It may take up to 10 business days for a change to an Investor's dividend treatment method to become effective.

### **Dollar cost averaging**

A self-service "Manage Recurring Investments" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements). Or, the Dollar Cost Averaging (DCA) Form can be submitted electronically via **SEIAdvisorCenter.com**.

The investment Advisor must indicate the total amount of money to be dollar cost averaged, the number of months or monthly dollar amount to DCA, the start date, and information regarding the trailing residuals.

Note for DCAs that are established via self-service: Once the DCA is activated and SPTC has established the DCA portfolio, it's the firm's responsibility to add funds to the DCA portfolio.

Upon receipt of funds, the initial investment will be handled according to the process described in the Cash Receipts section.

Each DCA amount will be moved from the DCA portfolio of your account to the portfolio associated with the chosen strategy. The cash will then be invested into the designated strategy the same day. If the balance of the DCA portfolio falls below the periodic investment amount while the DCA is active, the balance will be invested according to the DCA instructions and the DCA will be cancelled unless the DCA amount or end date is adjusted or sufficient funds are added to the DCA portfolio.

DCA is only available for accounts that use a strategy.

Please note, the minimum recommended amount for dollar cost averaging in a Managed Strategy is \$10,000 a month; lesser amounts are traded at the manager's discretion. In addition, if rebalancing is not turned on for a Managed Strategy, cash will be invested pro-rata. If rebalancing is on for a Managed Strategy, cash will be invested underweight.

### Fees

Advisory fees are deducted from the Investors' accounts quarterly (or monthly, upon request by the firm) in arrears or advance. Advisory fees are calculated using each account's settled market value as of the last day of the fee period (or the average daily settled market value, upon request by the firm). The annual fee is then divided by the number of fee periods in the year (four for quarterly, 12 for monthly). An account will have its fee pro-rated by the percentage of the fee period that the account was funded. Advisory fees will be collected around the second week of the following quarter/month if collecting in arrears, or around the second week of the beginning of the quarter/month if collecting in advance. Collection dates may vary depending on holidays and weekends.

Advisory fees are calculated on the market value of all portfolios except for 'Client Directed'. At an account level, advisors can request to exclude portfolios or specific assets from fees at an account level. At a firm level, all Advisory fees can be set to exclude certain portfolios and/or all Cash and Cash Equivalent assets from fees.

SPTC will use the following fee hierarchy to select a collection portfolio when a fee package is assigned. Portfolios will be reviewed in the following order:

- Transitory Cash (if the account uses an overlay)
- SEI Strategy
- A Managed Account portfolio
- Advisor-Guided
- Asset Transit

In the event that there are multiple portfolios of the same type (i.e., SEI Strategy 1 and SEI Strategy 2), the portfolio with the highest market value will be used.

If there is not enough cash for a fee, the Advisor must either make the cash available or provide additional instructions to raise the cash to satisfy the fee. If the cash is not made available within five business days, SPTC will delete the fee

SPTC will use the following process to select a new collection portfolio when there is insufficient cash held in the designated collection portfolio:

- Check for a Transitory Cash portfolio; confirm an overlay is established.
- If no overlay is established, select a different portfolio with available cash (excluding Client Directed & DCA portfolios).
- If cash is not available, SPTC will follow the fee hierarchy mentioned above to determine which portfolio from which to collect the fee.

If an account is first funded within the last 10 days of a fee period, no fee will be collected for that fee period. Instead, the number of days the account was funded in that fee period will be added to the number of days in the next fee period when the fee is calculated. This is done to eliminate the need to collect a very small fee soon after an account is funded.

# Payment of fees to registered investment advisors affiliated with a broker-dealer

SPTC will send fees via check, wire or ACH to the home office of the Broker-dealer. The home office is responsible for distributing the collected investment advisory fees to the appropriate representatives. Representatives of the Brokerdealer may, with the Broker-dealer's permission, have the ability to discount from the fee package(s) by establishing their own fee packages that are less than those of the Broker-dealer.

# Payment of fees to registered investment advisors not affiliated with a broker-dealer

SPTC will send fees via check, wire or ACH to the main office of the RIA. The RIA is responsible for distributing the collected investment advisory fees to the appropriate representatives. The Advisor establishes his/her fee package(s) with SPTC. Representatives of the Advisor may, with the Advisor's permission, have the ability to discount from the fee package(s) by establishing their own fee packages.

Advisory Fees: A self-service "Assign Fees" action is available on **SEIAdvisorCenter.com** to add, replace or remove an existing fee package on an account and/or fee group, select how the fee is calculated and charged to the portfolios, discount fees, or post fees to another account. SPTC will continue to add the account level fees per the Account Application. A "Manage Fees" action is available to create or modify fee packages. A "Manage Fee Groups" action is available to create, modify, or delete fee groups, which are used to group accounts to reduce the total fees charged. (These actions are subject to Broker-dealer approval and firm-approved user entitlements.) Or, the Fee Maintenance Form can be submitted electronically via **SEIAdvisorCenter.com**.

**Note:** To group advisory fees, each account must have the same tiered-fee package and discount. Accounts using a flat basispoint package will not be grouped for fee purposes.

**SEI Account Service Fees: Service Fees** (\$60/year) are also charged quarterly in arrears. Accounts above \$50,000 are not subject to this fee. purposes. To group SEI Account Service Fees, account holders must live in the same household and have a combined market value of \$1 million or greater upon receipt of the request to group fees.

**SEI Platform Fees:** The Platform Fee is charged, when applicable, to Investors' accounts quarterly in arrears based on an average daily market value. SEI funds and products, along with No Transaction Fee (NTF) funds, are exempt from the Platform Fee. Platform Fees are typically processed the second week on the month following quarter-end.

**Broker-dealer Fees:** Some accounts are subject to a Brokerdealer fee, which is also typically charged quarterly in arrears. These fees are determined at the individual Broker-dealer level and assigned to the accounts accordingly.

**Money Manager Fees:** Money Manager fees are charged quarterly in arrears and are calculated using each manager's average daily market value and pro-rated using an annual fee period. Fees are disbursed accordingly out of each underlying portfolio. Therefore, if an end Investor has four underlying manager portfolios, a manager fee will be calculated and disbursed out of each portfolio. The line item description on the Activity Statement is "Managed Account Fee." Standard Money Manager fees can be found on **SEIAdvisorCenter.com**.

The account or portfolio may be subject to other SEI Program fees. These include a Distribution-Focused Strategy (DFS) Fee, an SEI Giving Fund (RCF) Fee, a Personal Trust Services (PTS) Fee and an Independent Funds Model Program Fee. Please reference the SEI Wealth Platform Fee Schedule for the most up-to-date account fee information; for program-specific fee information, consult the relevant fee schedule and disclosure document.

# In-kind distributions and in-kind closings

#### Internal transfers (SPTC account to SPTC account)

- 1. Upon receipt by 2:30 p.m. Eastern time, the request will be processed within three to five business days.
- 2. Use the Internal Asset Transfer Form (In-Kind) or Roth Conversion Form (In-Kind). If the distributing and receiving accounts have been set up with the same TIN, the Advisor's signature will suffice; otherwise, the signature of the Investor (and joint Investor, if applicable) is also required.
- 3. Requests to process only cash in-kind will be processed as a liquidation transfer, not an in-kind transfer.
- 4. For in-kind closings, Advisors may opt to receive an account closing confirmation via email by making the appropriate selection on the Preferences page on **SEIAdvisorCenter.com**.

Note: The transfer of assets in-kind may involve the movement

of whole shares of equities. This may result in a market value split that is not the exact amount that's specified on the request. Please adhere to each asset's trade and splitting minimum.

#### External Transfers (transfer to another custodian)

- 1. Upon receipt by 2:30 p.m. Eastern time, requests to transfer SEI funds will be processed within three to five business days.
- 2. Requests to transfer SEI funds require a valid house account number that has been established with SEI's Transfer Agent.

**Note:** This option is not available to all custodians. Please contact your Transfers Service Team prior to submitting the transfer in-kind request.

### Manual SEI Mutual Fund Trades (Portfolios that do not utilize a strategy)

A self-service "Create a Trade Set" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements). Or, the Trade (SEI Fund) Form can be submitted electronically via **SEIAdvisorCenter.com**.

For those accounts that do not invest in a strategy but invest in individual SEI mutual funds, buy and/or sell trades must be submitted via self-service by 3:45 p.m. Eastern time, or by 2:30 p.m. Eastern time when using the Trade (SEI Fund) Form, to ensure that they will be processed at that day's closing net asset value (NAV).

If a request is submitted where dollars (\$) or units of Fund A are to be sold and the proceeds are to be used to purchase Fund B, Fund A will be sold with a trade date of Day 1 (provided the request is processed via self-service by 3:45 p.m. Eastern time or the Trade (SEI Fund) Form is received by 2:30 p.m. Eastern time) and the proceeds will be used to purchase Fund B with a trade date of Day 1. If necessary, Cash and Cash Equivalent may be used to cover the difference between the sell of Fund A and the purchase of Fund B. **Note:** If the dollar amount sell of Fund A is within 5% of the prior day's price, all units will be sold. As a result, the purchase of Fund B will receive a trade date of Day 2.

In submitting instructions for the purchase, redemption or exchange of shares of a mutual fund, you must ensure that the transaction complies with the terms of the applicable mutual fund's then-current prospectus, statement of additional information, and any policies and rules of such mutual fund, including, but not limited to, such mutual fund's policies/rules concerning eligibility, redemption fees, frequent trading and closed funds.

No trade confirmations will be sent to the Advisor or Investor. All transactions within an account will be detailed on the Activity and Transaction pages on **SEIAdvisorCenter.com** or the periodic activity statements.

### Portfolio accounting systems

SEI can provide a direct feed of all your account data to several third party software/service providers. SEI uses the two industry standard file formats, dbCAMS+ and Portfolio Center. These file formats are able to be loaded by many of the software tools offered today.

The downloads can include the following data:

- Names/Addresses
- Securities
- Prices
- Initial Positions (only for new accounts on Portfolio Center download)
- Transactions
- Positions (for reconciliation)

The dbCAMS+ download is contained in one consolidated file. The PortfolioCenter download contains individual files for each type of data.

In general, these files are available for download, on a daily basis, in the early morning for the prior day's activity. The data is a close-of-business snap shot of positions, prices, and transactions.

**Note:** SEI feeds are provided to you or your firm at no cost. However, there are costs associated with portfolio accounting software tools as well as with licensing data import utilities. To better understand your costs, please contact your software vendor for more information.

Consult the most recent Data Services Set Up/Change Form for a current list of providers. If your firm uses any of the vendors listed on the form, please contact your Service Team at **800-SEI-1003** to verify that your account information is on the SEI direct feed.

#### Setup

These instructions assume that you already own one of the two portfolio accounting systems mentioned earlier and that you are familiar with its use and populating the software with account data.

- Access the Data Services Set Up/Change Form by selecting Actions>Manage Forms on SEIAdvisorCenter.com.
   Complete the form and electronically submit it to SPTC.
   Submit a form for each user in your office who requires access to the data. This form identifies the format and users in your office who should have access to the download files.
- 2. Wait three to five business days to begin seeing daily files on the "Data Downloads" page within SEIAdvisorCenter.com. Note: If a new User ID is requested, it may take up to seven business days for that user to receive the User ID and password. If, after seven business days, you do not find daily files in the "Data Downloads" page on SEIAdvisorCenter. com, please contact your Service Team.

Begin downloading and using the data files directly from SEI.

#### Support

For technical support for **SEIAdvisorCenter.com**, contact SEI at **800-SEI-1003**, option 4. For more information about Data Downloads, please contact your Service Team at 800-SEI-1003. For help importing data into:

- Portfolio Center, contact technical support at 800-528-9595
- •dbCAMS+, contact technical support at 301-334-1800

## SEI Cash Access Account (CAA)

SEI Cash Access Account (CAA) is a full-service banking solution that is integrated with the SPTC investment account. It offers a checking account and/or a securities-backed line of credit (SBLOC) provided by The Bancorp Bank. Investors with a checking account are provided a VISA debit/ATM card along with unlimited checks, free online banking, overdraft protection solutions and monthly auto-sweep functionality as well as a dedicated customer support line.

- Use the appropriate CAA Application form to open an SEI Cash Access Account.
- The CAA service is available only for taxable accounts. It is not available on the following types of accounts: a) accounts registered to non-U.S. Investors or to non-U.S. addresses; b) accounts in which SPTC is the Trustee or Administrator of a Trust; c) accounts that are pledged to an outside institution; d) accounts where distributions/withdrawals are restricted; e) 403(b)s and qualified plans.
- The CAA Investor must currently be either an SPTC account holder or in the process of establishing an SPTC account. Any authorized signers on the CAA must be authorized signers on the SPTC account.
- Checks and/or debit cards are delivered to the Investor an average of 10 to 15 business days after the initial setup of the CAA. If the paperwork is not in good order, this could subsequently delay the account opening process.
- One of the key features of CAA is an automatic, monthly sweep between the SPTC investment account and the CAA checking account at The Bancorp Bank. Starting on the first business day after the CAA is established, and subsequently on the 20th of each month (or the first business day thereafter), SPTC or The Bancorp Bank will automatically transfer funds to restore the CAA checking account to the target minimum as selected on the CAA Application. When the balance in the checking account exceeds the target maximum (optional), funds will be swept back to the linked SPTC account. The following illustrates the hierarchy of the CAA asset liquidation process with respect to the monthly auto-sweep arrangement.
- Liquidation 1: Cash and Cash Equivalent in linked SPTC account (excludes DCA) Liquidation 2: Additional assets will be collected using the default raise cash method on the linked SPTC account

**Note:** Non-mutual fund assets, (i.e., stocks and bonds), with allocations in a strategy may be liquidated to satisfy the automatic target balance.

When an account has multiple portfolios, the portfolio with a strategy assigned to it will be accessed to raise cash. If no strategy exists, then cash will be raised via the default nonstrategy raise cash method. In both instances, the portfolio with the highest market value will be selected.

#### DCA portfolios are excluded from the monthly sweep.

Please contact your Service Team for more details regarding how cash will be raised for your Investor's specific account. Advisors who utilize CAA should ensure the Investor is aware of the liquidation procedures established to fulfill the minimum target balance. Advisors should be extremely sensitive to the nature of this liquidation process and the possibility of incurring capital gains on assets within the strategy that were not considered in the planning of the original strategy.

- The following illustrates the hierarchy of the CAA asset liquidation process with respect to writing checks or bill pay items. If the full amount of the check or bill pay item cannot be satisfied by the cash in the hierarchy below, an overdraft notice will be generated by Bancorp, and an overdraft fee may be charged by Bancorp.
  - Liquidation 1: CAA checking account
  - Liquidation 2: SBLOC if elected

#### Standard custody account

**Liquidation 3:** If there is only one portfolio in the account, the requested amount will be taken from that portfolio.

**Liquidation 4:** If there is more than one portfolio in the account, cash will be taken from the portfolio with the highest cash balance, then move on to the portfolio with the next highest, until it reaches the portfolio with the lowest balance.

# Standard managed account (Overlay Allocation present)

**Liquidation 3:** Search for cash in the following order: Transitory Cash portfolio, Equity Manager portfolio, Fixed-Income Manager portfolios.

**Liquidation 4:** If multiple portfolios exist within each category cash will be taken from the portfolio with the highest cash balance, then move on to the portfolio with the next highest, until it reaches the portfolio with the lowest balance.

The overdraft protection is not applicable to debit, wire and ATM transactions.

- A checkbook reorder fee will not be assessed to the Investor's CAA, however an Investor may be charged when expedited shipping is requested. The shipment of the first order (checks) coincides with the 10 to 15 business day account setup time-frame.
- The CAA will accept regularly scheduled disbursements or deposits set up by the Investor through the use of Automatic Clearing House (ACH) transactions. Additionally, other deposit options are available as outlined in the CAA Investor Brochure.
- There is no minimum account balance that must be maintained throughout the course of the month. However, the minimum monthly sweep amount = \$5,000.
- If the account is participating in the CAA program, upon the closure of the SPTC account, the CAA will be closed. The Bancorp Bank will mail a check to the address on record for the balance remaining in the CAA. Contact The Bancorp Bank ahead of time if the Investor wants to keep the CAA open.

### **Strategy changes**

For information about changing a strategy on a Managed Account Solutions account, see Investment Strategy Allocation Changes section in the Managed Account Solutions portion of this Guide.

- 1. A self-service "Modify Investment Assignment" action is available on **SEIAdvisorCenter.com** (subject to Brokerdealer approval and firm-approved user entitlements). Or, the Strategy Change Form can be submitted electronically via **SEIAdvisorCenter.com**.
- 2. Upon completion of a self-service transaction by 3:45 p.m. Eastern time, or 2:30 p.m. Eastern time when using the Strategy Change Form, each fund will be purchased or sold in order to reallocate the assets currently held in the account according to the new strategy's target allocations and variances. Assets that are held in both the old and new strategies will be reallocated according to the new strategy's target allocations if those assets are not already within variance of the new target allocations.
- 3.SEI offers rebalancing options online at **SEIAdvisorCenter.com** when you elect to process your strategy change via self-service.

**Note:** When submitting a two-part request (i.e., strategy change and a distribution) please indicate which transaction you would like to occur first; unless otherwise instructed, the distribution will be processed first. Strategy changes cannot take place on the same trade date that cash is being raised to cover a distribution.

# Investor reporting.

Investors will receive the following standard reports:

- Quarterly Value and Activity Statement
- IRS Tax Forms/Annual Tax Information Letter
- Account and Portfolio Performance

#### Access my portfolio

Investors have the ability to view and download electronic copies of their SPTC financial statements and tax forms via our end-Investor website, **AccessMyPortfolio.com**. They can also use the website to opt out of physical paper delivery and opt into electronic only delivery. Electronic only delivery Investors will be notified via e-mail to login to the Investor website and retrieve their statements or tax forms.

By selecting the link labeled "Documents" the user can view his/her statements or tax forms.

Electronic delivery options are also available for proxies , prospectuses, Form ADV and annual reports.

#### Bulk statement download

Advisors receive a concise "bundled" collection of their investors' statements, commonly referred to as the Bulk Statement Download (BSD). Advisors can access their BSDs via the specific link on **SEIAdvisorCenter.com**. On a nonquarterend month, there will be one BSD bundle per Advisor for full color activity-only statements. On a quarter-end month, there can be up to two BSD bundles per Advisor; a full-color activityonly statement file and a full-color combined performance/ activity statement file. These BSDs are typically available two business days after the web release of statements.

#### Bulk tax form download

During the first quarter of each year, SPTC will produce tax forms for accounts eligible for tax reporting. After each wave of tax forms are generated, SPTC will create a bulk download of all the Investor tax forms that were finalized; these downloads are typically available two business days after the tax forms are posted. There will be multiple downloads throughout the quarter as tax forms are finalized at different times.

#### Performance reporting

Detailed performance information is available through **SEIAdvisorCenter.com** by selecting Advanced Client Reporting from the External Links option.

Performance information is loaded to **AccessMyPortfolio.com** on a monthly basis by the 10th business day of the following month. The following performance periods are available. Trailing 3-month, 12-month, 3-year, 5-year, year-to-date and inceptionto-date. The same performance information is available on the performance portlet on **SEIAdvisorCenter.com** in the same timeframe.

There are additional performance reporting display options available on available on **AccessMyPortfolio.com**, including changing the benchmark display or removing the performance reporting entirely. These changes can be requested on the Reporting Option Selection Form. This is a firm-level change.

Performance is available on the account and portfolio level. However, historical portfolio-level returns may not be available if the portfolio was not funded at the same time the account was.

The performance information does not reflect a simple rate of return or measure the net change in assets of a strategy. The performance measurement is used as a means of quantifying a money manager's ability to invest an Investor's money. Each month, SEI's performance vendor calculates an account's return using the Time-Weighted Rate of Return (TWRR) formula. The timing of external cash flows into and out of an account can influence the investment's returns. The TWRR provides a fair assessment of how well an account has been managed by discounting this influence. For periods greater than one year, the returns are annualized.

# Processing cutoff times.

Transaction request	Request must be received at SEI by the following times (Eastern time) to be processed with date of receipt being day 1	Trade date	Required documentation/forms
Account closing (In-kind)	2:30 p.m.	N/A	Internal Asset Transfer Form (In-Kind)
Account Closing (Liquidation)	2:30 p.m.	Day 1	Distribution Form (IRA, Non-IRA, QP or 403(b))
Cash disbursement (wire, check or ACH Disbursement)	2:30 p.m.** (11 a.m.for accounts with a sufficient Cash and Cash Equivalent balance from which a same-day disbursement can be made)	Day 1	Distribution Form (IRA, Non-IRA, QP or 403(b))
Check deposit	12 p.m.	Day 1	Additional Investment Form (IRA or Non-IRA)
Dollar cost averaging	2:30 p.m.	Day 1	Dollar Cost Averaging (DCA) Form
Establish an individual Retirement Account (IRA)	12 p.m.	N/A	Account Application Individual Retirement Account (IRA)
Establish a non-IRA account	12 p.m.	N/A	Account Application
Establish custom strategy	2:30 p.m.*	Day 1	Custom Investment Portfolio Form for Portfolio Realignment
Fed wire/lockbox payment	2 p.m.	Day 1	Additional Investment Form (IRA or Non-IRA)
Internal transfer (In-kind)	2:30 p.m.	N/A	Internal Asset Transfer Form (In-Kind)
Manual trade requests— Portfolios that do not utilize a strategy	2:30 p.m.*	Day 1	Trade (SEI Fund) Form
Monetary change (Mutual Fund accounts only)	2:30 p.m.	Day 1	Monetary Change Form
Strategy Change	2:30 p.m.*	Day 1	Investment Strategy Change Form

\* 3:45 p.m. if submitted via self-service on **SEIAdvisorCenter.com** 

\*\* 1:30 p.m. for Same-Day disbursements if submitted via self-service on **SEIAdvisorCenter.com** for accounts with a sufficient Cash and Cash Equivalent balance from which a same-day disbursement can be made.

# Administrative forms.

Some of the most commonly used administrative forms are listed below. Read and complete all applicable sections of the forms prior to submission.

Title of document	Required signature
Account Control Agreement	Pledgor and Pledgee**
Account Registration Change Form	Investor and Advisor**
Additional Investment Form (IRA)*	Investor and Advisor
Additional Investment Form (Non-IRA)	Advisor
Address Change Form	Advisor or Investor
Advisor Contact Information Change Form	Advisor or Authorized Person
Agent Authorization (Power of Attorney) Form	Investor (if able to act), Agent and Notary**
Automatic Investment Program (AIP) Forms (IRA and Non-IRA)	Investor
Automatic Investment Program (AIP) Form (Qualified Plan)	Plan Sponsor
Corporate/Organization/Partnership Resolution	Authorized Individuals**
Distribution Form (IRA)	Advisor and Investor (unless check distribution to name and address of record/internal transfer to SPTC account owned by the Investor, or to an account in which standing instructions have been submitted to, and accepted by, SPTC)
Distribution Form (Non-IRA)	Advisor and Investor (unless check distribution to name and address of record/internal transfer to SPTC account owned by the Investor, or to an account in which standing instructions have been submitted to, and accepted by, SPTC)
Dollar Cost Averaging (DCA) Form	Advisor
Fee Maintenance Form	Advisor
Inherited IRA Beneficiary Election Form	Named Beneficiary(ies)**
Insured Deposit Cash: Bank Opt Out Form	Advisor
Internal Asset Transfer Form (In-Kind)	Advisor and Investor (unless transfer is to an account owned by the Investor)
Investment Strategy Change Form	Advisor
IRA Beneficiary Designation Form	Investor
Liquidation/Cash Transfer Form	Investor and Joint Owner (if applicable)
Monetary Change Form	Advisor
Name Change Form	Investor**
Roth Conversion Form (In-Kind)	Advisor (and Investor, optional)
Signature Card	Investor and Advisor**
Standing Instructions Form	Investor and Advisor
Trade (SEI Fund) Form	Advisor
Transfer on Death (TOD) Beneficiary Designation/Change Form	Investor and Joint Owner (if applicable)
Trustee Certification	All Acting Trustees**

**Trustee Certification** 

All Acting Trustees\*\*

\* For indirect rollovers and other receipts. An indirect rollover occurs when an IRA owner takes a distribution from a qualified account that ultimately "...comes under the control of the Investor...", and is subsequently deposited into another qualified plan or IRA within 60 days of the day that the original distribution is received.

\*\*A wet/ink signature is required on this form.

# Distribution requirements guide.

These requests are handled on a case-by-case basis, and more paperwork may be required than what is stated below.

Types of account/ distribution	Required forms	Required signature
Non-IRA Distribution	Non-IRA Distribution Form	Advisor and Investor (unless check distribution to name and address of record or internal transfer to SPTC account owned by the Investor, or Standing Instructions Form has been submitted to, and accepted by, SPTC)
Individual (deceased)	Death Certificate (court-certified copy with raised/legible seal)	Executor(s) (or Beneficiary(ies) listed on
	Letters of Testamentary indicating Executor or Administrator of estate (court-certified copy with raised/legible seal) (not needed if TOD on file)	the TOD) and Advisor; Transfer on Death (TOD) Payment to Beneficiary Form: beneficiary
	Distribution Form	beneficiary
	Inheritance Tax Waiver (if required)	
	New Account Application (if money is staying at SEI)	
	Transfer on Death (TOD) Payment to Beneficiary Form (if TOD on file)	
	Form W-9 (if TOD on file and account is being liquidated)	
Joint Tenant with	One joint owner deceased	If ONE Joint Owner is deceased,
Rights of Survivorship and Tenants by	Death Certificate (court-certified copy with raised/legible seal)	surviving Joint Owner and Advisor; if ALL Joint Owners are deceased, Executor(s)
Entirety (deceased)	Account Registration Change Form or Account Application ONLY if the TIN is changing to a Nonspouse (Distribution Form or Internal Asset Transfer Form (In-Kind) would also be needed in this case)	(or Beneficiary(ies) listed on the TOD) and Advisor; Transfer on Death (TOD) Payment to Beneficiary Form: beneficiary
	All joint owners are deceased	
	Death Certificates (court-certified copies with raised/legible seal)	
	Letters of Testamentary (court-certified copy with raised/legible seal) (not needed if TOD on file)	
	Distribution Form	
	Inheritance Tax Waiver (if required)	
	New Account Application (if money is staying at SEI)	
	Transfer on Death (TOD) Payment to Beneficiary Form (if TOD on file)	
	Form W-9 (if TOD on file and account is being liquidated)	
Tenants in Common	One joint owner deceased	If ONE Joint Owner is deceased,
(deceased)	Death Certificate (court-certified copy with raised/legible seal)	surviving Joint Owner, Executor of the estate and Advisor; if ALL Joint Owners
	Letters of Testamentary (court-certified copy with raised/legible seal)	are deceased, Executor(s) and Advisor
	Distribution Form	
	Inheritance Tax Waiver (if required)	
	New Account Application (if money is staying at SEI)	
	All joint owners are deceased	
	Death Certificates (court-certified copies with raised/legible seal)	
	Letters of Testamentary (court-certified copy with raised/legible seal)	
	Distribution Form	
	Inheritance Tax Waiver (if required)	
	New Account Application (if money is staying at SEI)	

# Distribution requirements guide (continued)

Types of account/ distribution	Required forms	Required signature
Community Property (deceased)	One joint owner deceased Death Certificate (court-certified copy with raised/legible seal) Letters of Testamentary (court-certified copy with raised/legible seal) Distribution Form Inheritance Tax Waiver (if required) New Account Application (if money is staying here)	If ONE Joint Owner is deceased, surviving Joint Owner, Executor of the estate and Advisor; if ALL Joint Owners are deceased, Executor(s) and Advisor
	All joint owners are deceased Death Certificates (court-certified copies with raised/legible seal) Letters of Testamentary (court-certified copy with raised/legible seal) Distribution Form Inheritance Tax Waiver (if required) New Account Application (if money is staying at SEI)	
Community Property with Rights of Survivorship (deceased)	One joint owner deceased Death Certificate (court-certified copy with raised/legible seal) Account Registration Change Form All joint owners are deceased Death Certificates (court-certified copies with raised/legible seal) Letters of Testamentary (court-certified copy with raised/legible seal) Distribution Form Inheritance Tax Waiver (if required)	Distribution Form: Executor(s) and Advisor; Account Application: Executor(s) and Advisor; Account Registration Change Form: Surviving Joint Owner and Advisor
Trust Account (Death of the Trustee)	New Account Application (if money is staying at SEI) Death Certificate (court-certified copy with raised/legible seal) Copy of the trust; the trust document should name the Successor Trustee(s) of the trust. Distribution Form (if closing) Trustee Certification Form New Account Application if the TIN for the trust is changing; if the TIN is	Distribution Form: Successor Trustee(s) and Advisor; Trustee Certification Form: Successor Trustee(s); Account Application: Trustee and Advisor
UTMA/UGMA (Death of)	<ul> <li>changing from one spouse's to the other spouse's, an Account Registration Change Form can be submitted in lieu of a Non-IRA Account Application.</li> <li><b>Custodian is Deceased and Minor is OVER 14 years old</b></li> <li>Photocopy of minor's Birth Certificate (if not available, a copy of a valid state ID is acceptable)</li> <li>Notarized LOI from minor appointing a new Custodian, or a court-certified document indicating the Successor Custodian</li> <li>Death Certificate (court-certified copy with raised/legible seal)</li> </ul>	Distribution Form: Successor Custodian or Recipient of the Funds and Advisor; Account Registration Change Form: Successor Custodian and Advisor
	Account Registration Change Form with AML for Successor Custodian Custodian is Deceased and Minor is UNDER 14 years old Court-certified document indicating who has been appointed Successor Custodian Account Registration Change Form with AML for Successor Custodian Death Certificate (court-certified copy with raised/legible seal) Minor is Deceased Distribution Form	
	Distribution Form Death Certificate (court-certified copy with raised/legible seal)	

# Distribution requirements guide (continued)

Types of account/ distribution	Required forms	Required signature		
Non-IRA Distribution Due to Divorce	Non-IRA Distribution Form (fill out "Divorce Decree" Section)	Investor and Advisor		
Pledged Account	Distribution Form	Distribution Form: Investor and Advisor		
Distribution	"Signature guaranteed" letter from the lender granting permission for the distribution; letter must be on bank letterhead and must include the amount, date and payee of the distribution. <b>Note:</b> If the account is pledged to The Bancorp Bank or Nationwide Smart Credit/Supernova, no "signature guaranteed" letter is necessary.	Signature Guaranteed Letter: Authorize Signer at the Bank		
IRA Distribution	IRA Distribution Form	Advisor and Investor (unless check distribution to name and address of record, or internal transfer to SPTC account owned by the Investor, or a Standing Instructions Form has been submitted to, and accepted by, SPTC)		
Recharacterization	IRA Account Application to establish Traditional IRA	Account Application and Distribution		
(Roth to Traditional)	IRA Beneficiary Designation Form	Form: Investor and Advisor; IRA Beneficiary Designation Form: Investor		
,	IRA Distribution Form			
Roth Conversion	IRA Account Application to establish Roth IRA	Account Application and Distribution		
(Traditional to Roth)	IRA Beneficiary Designation Form	Form: Investor and Advisor; IRA Beneficiary Designation Form: Investor;		
Kotny	IRA Distribution Form or Roth Conversion Form (In-Kind)	and Roth Conversion Form (In-Kind): Advisor (and Investor, optional)		
Excess Contribution Removal (IRA)	IRA Distribution Form (include the Date and Amount of the Excess Contribution)	Investor and Advisor		
IRA Distribution	Death Certificate (court-certified copy with raised/legible seal)	Inherited IRA Beneficiary Election Form:		
due to Death	Inherited IRA Beneficiary Election Form (refer to the IRA Beneficiary Election Forms Guide for additional paperwork)	Beneficiary and Advisor		
IRA Transfer due to	IRA Distribution Form	Distribution Form: Recipient and Advisor		
Divorce	Complete Divorce Decree (refer to "Help Section" for required language)			
403(b) Distribution	403(b) Distribution Form	Employee, Employer (if applicable) and Advisor		
403(b) Distribution	403(b) Distribution Form	Distribution Form: Beneficiary and		
due to Death	Note: If owner dies, only the spouse can rollover to an IRA	Advisor		
	Form W-9 (unless money is staying at SPTC)			
403(b) Distribution	403(b) Distribution Form	Distribution Form: Recipient and Advisor		
due to Divorce	QDRO with required language (refer to Divorce Decree in the "Help Section") (court-certified copy with a raised/legible seal)			

# Help section.

Types of documentation	Additional information	Required signatures				
Affidavit of Domicile	Must be notarized.					
Birth Certificate	Can be submitted electronically. If mailed, copy is acceptable.					
Certification of Controlling Party and Beneficial	Form found in all Non-IRA Account Applications; used to capture required Customer Identification information for one controlling party and beneficial owners* with 25% or more ownership.	Person Opening/Maintaining Account				
Owner(s)	*Beneficial owner section only applies to Partnership, Private Corporation and Sole Proprietorship accounts.					
Court Appointment of Fiduciary	Can be submitted electronically. If mailed, copy is acceptable. The copy must raised court seal and be original. If submitted electronically, raised seal must					
Death Certificate	Must have raised/legible seal.					
Divorce Decree	Required Language					
[Qualified Domestic	Specific reference to SPTC as Custodian of the IRA					
Relations Order (QDRO)] (For IRA	Account title and number as it appears on SEI Statements					
accounts)	Exact Dollar amount or % of the account to be transferred					
	Date upon which that amount listed is based					
	Statement as to whether market fluctuation is taken into account on the date when the actual distribution takes place					
	Reference as to whether the transaction is to be processed as a non-reportal	ble transfer or as a reportable rollover				
	Copies of the Decree are acceptable provided that the document bears ori authority, that the document being submitted "is a true and correct copy					
Inheritance Tax Waiver	Can be submitted electronically. If mailed, copy is acceptable. States includes Montana, New Hampshire, North Carolina, Ohio, Pennsylvania (only if it's a Dakota, Tennessee, Puerto Rico, New York (only if death occurred before Feb	Trust or TOD designation account), South				
Letter of Acceptance (Required for an IRA Transfer)	Note: The Letter of Acceptance must be signed by an authorized individual of the receiving firm and include acceptance language identical or similar to the following,"(receiving custodian's name) has opened an account on behalf of the above mentioned Investor and is willing to accept the assets as successor custodian" It also must mention the type of account.	Custodian				
Letters of Testamentary	Short Certificate or Letter of Administration with raised court seal.	Officers of the court				

# Inherited IRA beneficiary election form guide.

Beneficiary named account	Election	Required forms	Signature on paperwork
Spouse	Five- or Ten-Year Payments	Death Certificate (court-certified copy with raised/ legible seal)	Spouse (and Advisor on Inherited IRA Beneficiary Election Form and Account
		Inherited IRA Beneficiary Election Form	Application)
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
Spouse	Life Expectancy Payments/Continued	Death Certificate (court-certified copy with raised/ legible seal)	Spouse (and Advisor on Inherited IRA Beneficiary Election Form and Account
	Distributions	Inherited IRA Beneficiary Election Form	Application)
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
Spouse	Total Distribution	Death Certificate (court-certified copy with raised/ legible seal)	Spouse (and Advisor on Inherited IRA Beneficiary Election Form and Distribution
		Inherited IRA Beneficiary Election Form	Form)
		Distribution Form (IRA) (Death checked as reason)	
		Form W-9	
Spouse	Rollover or Transfer	Death Certificate (court-certified copy with raised/ legible seal)	Spouse (and Advisor on Inherited IRA Beneficiary Election Form and Account
		Inherited IRA Beneficiary Election Form	Application)
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
Nonspouse	Five- or Ten-Year Payments	Death Certificate (court-certified copy with raised/ legible seal)	Beneficiary (and Advisor on Inherited IRA Beneficiary Election Form and Account
		Inherited IRA Beneficiary Election Form	Application)
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
Nonspouse	Life Expectancy Payments	Death Certificate (court-certified copy with raised/ legible seal)	Beneficiary (and Advisor on Inherited IRA Beneficiary Election Form and Account
		Inherited IRA Beneficiary Election Form	Application)
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
Nonspouse	Total Distribution	Death Certificate (court-certified copy with raised/ legible seal)	Beneficiary (and Advisor on Distribution Form)
		Inherited IRA Beneficiary Election Form	
		Distribution Form (IRA) (Death checked as reason)	
		Form W-9	
Estate	Five- or Ten-Year Payments	Death Certificate (court-certified copy with raised/ legible seal)	Executor (and Advisor on Inherited IRA Beneficiary Election Form and Account
		Inherited IRA Beneficiary Election Form	Application)
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
		Letters of Testamentary or Short Certificate (court- certified copy withraised/legible seal)	
		A Corporate/Organization/Partnership Resolution (if the Executor of the estate is a company)	

# Inherited IRA beneficiary election form guide (continued)

Beneficiary named account	Election	Required forms	Signature on paperwork
Estate	Life Expectancy Payments	Death Certificate (court-certified copy with raised/ legible seal)	Executor (and Advisor on Inherited IRA Beneficiary Election Form)
		Inherited IRA Beneficiary Election Form	
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
		Letters of Testamentary or Short Certificate (court- certified copy with raised/legible seal)	
		A Corporate/Organization/Partnership Resolution (if the Executor of the estate is a company)	
Estate	Total Distribution	Death Certificate (court-certified copy with raised/ legible seal)	Executor (and Advisor on Inherited IRA Beneficiary Election Form and Distribution Form)
		Inherited IRA Beneficiary Election Form	
		Distribution Form (IRA) (Death checked as reason)	
		Form W-9	
		Letters of Testamentary or Short Certificate (court- certified copy with raised/legible seal)	
		A Corporate/Organization/Partnership Resolution (if the Executor of the estate is a company)	
Trust	Five- or Ten-Year Payments	Death Certificate (court-certified copy with raised/ legible seal)	Trustee (and Advisor on Inherited IRA Beneficiary Election Form and Account Application)
		Inherited IRA Beneficiary Election Form	
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
		Trustee Certification	
		Copy of the applicable section(s) of the Trust Document	
Trust	Life Expectancy Payments	Death Certificate (court-certified copy with raised/ legible seal)	Trustee (and Advisor on Inherited IRA Beneficiary Election Form and Account Application)
		Inherited IRA Beneficiary Election Form	
		Account Application (IRA) (if applicable)	
		IRA Beneficiary Designation Form (optional)	
		Trustee Certification	
		Copy of the applicable section(s) of the Trust Document	
Trust	Total Distribution	Death Certificate (court-certified copy with raised/ legible seal)	Trustee (and Advisor on Inherited IRA Beneficiary Election Form and Distribution Form)
		Inherited IRA Beneficiary Election Form	
		Distribution Form (IRA) (Death checked as reason)	
		Form W-9	
		Trustee Certification Form	
		Copy of the applicable section(s) of the Trust Document	
Charitable Organization	Total Distribution	Inherited IRA Beneficiary Election Form	Corporate Officer (and Advisor on Inherited IRA Beneficiary Election Form and Distribution Form)
		Corporate/Organization/Partnership Resolution	
		Distribution Form (IRA) (Death checked as reason)	,

# Advisor error–Monetary correction submissions.

Corrections to a customer account due to an Advisor trade or monetary error begin upon receipt of a signed **Advisor Error (Trade/Monetary) Correction and Indemnification Form.** SPTC does not guarantee that a correction will be completed on the date of receipt of the request. The normal correction process in which all adjustments necessary to correct the account are completed occurs within 7 - 10 business days of SPTC receiving the request.

SPTC makes every effort to complete the correction as quickly as possible to limit market exposure. **The actual time required to complete a given correction is influenced by a number of factors including, but not limited to, the form being received in good order, the length of time between the date of the error and the date that SPTC is notified, the number of transactions to be corrected, and the amount of research required to complete the correction. SPTC is not responsible for any losses incurred as a result of market activity while a correction is being processed.** As the Advisor, if you decide to place offsetting buys or sells following the error for any reason, you will still be responsible to cover any losses incurred as a result and must include those transaction details in this correction request.

Corrections are based on the date that the original transaction request was processed, not on the date that the request for an error correction, i.e., the form, is received. Transactions placed on the affected account(s) **after the correction process has begun** may result in significant delays of the completion of the correction process.

Upon completion of an error correction in which a loss has resulted, SPTC will send a Request for Reclaim (Request) to the Advisor which states the amount of the loss, provides payment instructions, and sets forth a due date 30 business days from the date of the Request. If applicable, a final Request will be sent to the Advisor which again states the amount of the loss, provides payment instructions, and sets forth a due date of 15 business days from the date of the final Request.

Advisor/Firm: In the event that an Advisor or the Firm has not reimbursed SPTC within 30 business days of the completed correction once notified, SPTC may exercise its right of set-off and post a debit for the loss amount to the Firm's fee clearing account on the first business day following the due date in order to recoup the funds owed to SPTC. This means that any existing balances in, or subsequent credits posted to, the fee clearing account will be less than the posted debit amount. Until/unless the amount owed is fully reimbursed, the fee clearing account will reflect a debit associated with this correction.

# Getting started–SEI's managed account solutions.

	Availability	Required next steps
Step 1: Client profiling kit	Register for access to SEIAdvisorCenter.com	
	Download a copy of the Client Profiling Kit. Ask your client to fill out this Questionnaire. You will find the scoring guide to this Questionnaire under the Forms Library as well. This will help us recommend a proper allocation for your client.	
Step 2: Proposal	Go to <b>SEIAdvisorCenter.com</b> by clicking on the Business menu item and selecting Create New Proposal.	
	If you do not have access to Proposal Builder, contact your SEI Account Executive at 800-SEI-1003, <b>option 2</b> .	
Step 3: Case support/discussion	For more complex opportunities or for opportunities over \$1 million, additional case support can be provided through SEI's Investment Case and Analysis Team (ICAT Team) at <b>800-SEI-1003, option 2</b> . This team is comprised of CFPs, CPAs and CFAs who provide customized performance analytics, investment analysis, advice, planning and presentation support.	
Step 4: Account agreements and applications	Forms are available online at <b>SEIAdvisorCenter.com</b>	
Step 5: Submit completed forms	Forms should be submitted electronically via <b>SEIAdvisorCenter.com</b> by selecting Actions>Manage Forms. For additional contact information, please select Help>Resources>Contact SEI from the home page of <b>SEIAdvisorCenter.com</b> .	Documents required to set up an account.
		Account Application - signed by Investor.
		If you are transitioning existing securities into this program, a Tax Transition analysis – signed by Investor.
		Relevant disclosure documents (i.e., prospectuses and Advisor Form ADV) – deliver

to Investor.

**Note:** If an account is not funded within six months from the date the completed paperwork is received by SPTC, it will not be eligible to participate in the aforementioned program.

# Opening a managed strategy in a managed account solutions account.

### **Taxable accounts**

- Complete the Managed Account Solutions Account Application. (Forward Disclosure Document, Custody Agreement to Investor.)
- Deliver relevant disclosure documents (i.e, prospectuses and Advisor Form ADV) to Investor.
- Those accounts transferring individual securities in-kind must provide a signed Tax Transition Proposal (TTP) with completed cost basis given for all transferring securities. The TTP represents an estimate of the expected tax cost an Investor will incur based upon market values of the underlying securities at the time of the proposal as a result of the information provided by the Advisor. This information will drive the allocation of securities to the selected individually managed account managers during implementation of the asset allocation strategy indicated on the Managed Account Solutions Account Application. Therefore, it is critical to use the most accurate information available on an Investor's account when requesting a TTP. During implementation, changes to the underlying securities (market value, number of shares, cost basis, additional securities, etc.) may impact the realized tax cost of implementation to the Investor. SEI will not be held responsible for any deviations in tax cost realized to the Investor due to these changes.

## IRA/SEP/Roth/SIMPLE IRA

- Complete the Managed Account Solutions Account Application (IRA) or (SIMPLE IRA), as appropriate. (Forward Disclosure Document, Custody Agreement, Individual Retirement Account Custodial Agreement and IRA Disclosure Statement Amendment to the Investor.)
- Deliver relevant disclosure documents (i.e, prospectuses and Advisor Form ADV) to Investor.

# Trustee-directed defined benefit plans

Accepting Trustee-Directed Benefit Plan assets into individually managed accounts brings on increased fiduciary liability for SEI under ERISA rules and regulations. Unlike SEI's core mutual fund program, SEI becomes the named Advisor on these plans because there is individual security ownership with individually managed accounts. Although the Advisor is still responsible for suitability, SEI is co-Advisor on the account and the fiduciary liabilities that we incur by acting in that capacity cannot be delegated to other parties.

In order for SEI to accept trustee-directed accounts, including traditional defined benefit, profit-sharing plans and some money purchase plans, there are some additional information and requirements that need to be adhered to:

- Participant-directed plans, defined contribution 401(k)s, 403(b)s, etc. cannot be invested in individually managed accounts.
- No custom portfolios are available. Advisors need to utilize SEI's recommended investment allocations. Specifying investment strategies that are a custom blend of managers and/or funds will not be allowed. The only exception to this rule is if the Advisor supplies statements from the Investor's other investment provider showing SEI that a custom manager selection is appropriate.
- The Plan document (if there is one), the Investment Policy Statement (if there is one), along with the completed agreements and applications need to be submitted. These documents will be reviewed and approved by the Investor Account Management Team (800-SEI-1003, option 2), prior to investing the assets to ensure that the investment selection and proxy voting rules correspond with all provisions of the documents.
- Complete the Trustee-Directed Defined Benefit Forms.
- Complete the Institutional Questionnaire (available on **SEIAdvisorCenter.com**).

### **Processing cutoff times**

Unlike our core Mutual Fund Program that employs SEI mutual funds to invest and/or raise cash, the Managed Account Solutions program employs money managers purchasing and selling securities on the Investor's behalf. As a result, a request to disburse cash, liquidate holdings, change managers, invest cash or change the investment strategy must go through a different process.

With Managed Account Solutions (separate money manager accounts), from the time we receive the appropriate paperwork it may take up to five business days to process an additional investment and up to eight business days to process a disbursement. (Note: Liquidating fixed-income securities may take longer depending on market conditions and liquidity.) If only mutual funds are involved, the standard processing cutoff times apply. If you have an immediate need to disburse cash, please contact your Service Team (800-SEI-1003, option 1) to determine when a disbursement request will be completed.

# Annual offer of ADV part 2 documents

The SEC requires that an annual offer of ADV Part 2 documents from SEI Investments Management Corporation and each money manager be made available to each Investor. A communication will be sent from SEI to each at least once a year providing instructions on how he/she can receive these updated documents.

### **Annual suitability validation**

As the Advisor, you are responsible for suitability and meeting with each Investor at least one time annually to reassess his/ her personal circumstances as they relate to the Investor's investment objectives and overall investment strategy. SEI is required to contact each Advisor annually to update and discuss each Investor's profile. The purpose of this is to note any changes to the Investor's circumstances and implement changes that may be warranted to the overall investment strategy.

### Investor proposal generation

SEI's Proposal Builder can be accessed via SEI's Internet site, **SEIAdvisorCenter.com**, by clicking on the Business menu item and selecting Create New Proposal.

The SEI Proposal Builder enables Advisors to generate highly customized investment proposals for Investors and prospects in a manner which clearly demonstrates the benefits of the proposed asset management strategies.

#### Highlights

- Single and consolidated proposal process accessing all of SEI's products
- Advisor specific branding and customizations
- Editable Proposal output
- Investment Policy Statement
- Indefinite storage of Proposal information and output
- Use of Discretion within Managed Account Solutions

SEI Investments has investment discretion, thereby the authority to buy and sell securities, when to buy and sell, and in what dollar amounts. This is done in accordance with the Investor's selected investment objective, while taking into consideration any socially responsible restrictions or specific stock screens requested. SEI Investments has the authority to appoint portfolio manager(s) to buy and sell securities and manage assets in accordance with the guidelines of the individually managed account strategy mandates.

# Managed account solutions account structure.

An Investor's account in our standard program can consist of one or more portfolios existing underneath the umbrella of a single account. These portfolios may contain any combination of varied style-specific equity managers, fixedincome managers, mutual funds, and outside assets. The use of portfolios allow for the standardization of business rules and treatment of like assets within an account. Systematic withdrawals, dollar cost averaging, transfers of dividends and income, etc., will all be conducted within the account.

Listed below is an example of how accounts for one Investor may be structured:

- Account #12345
  - Portfolio 1: Equity Managers
  - Portfolio 2: SEI Funds
  - Portfolio 3: SEI Fixed Income
  - Portfolio 4: Advisor-Guided
  - Portfolio 5: Transitory Cash
  - Portfolio 6: Dollar Cost Averaging

Consult the current Managed Account forms for a list of current equity managers and their investment styles.

- When a Managed Account is funded, cash and securities will flow into a single portfolio. The funding is then disbursed into the appropriate portfolios based on the investment strategy chosen. As a result, when reviewing transactions on statements, or through the desktop, you may notice multiple receipts and disbursements within the account.
- Account Minimums–Managed Portfolios
   There are specific account minimums that are required for
   each manager to be included in the account. Consult the
   current Managed Account forms for the manager minimums.
- To convert a custody account to a Managed Account, complete and submit the Managed Accounts: Managed Strategy Addendum. To convert a Managed Account to a custody account, complete and submit the Managed Account to Non-Managed Custody Account Transition Form.
- Investors may elect to apply a tax management overlay to certain of the available equity Investment Strategies, as well as select tax-managed versions of the Managed Account Strategies, as specified in the Account Application.

# Transaction guidelines.

### **Account funding process**

There are a number of choices available for funding the underlying portfolios in an Investor's account. These options should be specified on the Account Application. They are as follows:

#### For accounts transferring in any portion of cash

- Option 1: Investing will begin when all assets are received.
- Option 2: Fund any mutual funds in the account first and then the individually managed portfolios in a specified order noted on the Account Application.
- Option 3: Fund the individually managed portfolios first in a specified manager order and then any mutual funds that are part of the account.

#### For accounts transferring securities in-kind

- Option 1: Wait until all assets have been received.
- Option 2: As assets come into the Asset Transit portfolio, the underlying portfolios can be funded in a specified order noted on the Account Application. Please consult SEIAdvisorCenter.com for the minimums to fund each individually managed portfolio. Individually managed portfolios will fund with the total dollar value designated to the specific money manager. (They will not fund in partial increments.)

#### For Equity Managers

The funding of the Equities Manager portfolio must be made according to the strategy selected. Specific managers of the strategy cannot be selected.

### **Estimated timing for account funding**

The following are general timing estimates when a manager's account will be traded.

- If an account is funded with cash: within seven business days after the completed account paperwork is received and accepted by SPTC.
- If an account is funded with securities: seven to 10 business days after the transfer of securities has occurred. It should also be noted that after an account is released to a manager, each manager has different funding and timing guidelines that are consistent with their investment process. However, in most cases, an account will be fully funded within seven business days of receipt of the assets.

**Note:** The funding of a fixed-income portfolio can take six to eight weeks for a national portfolio and up to 12 weeks for a state-specific portfolio. An extended time period provides the fixed-income manager with more opportunities to purchase the appropriate bond with favorable structural characteristics at the right price.

- Managers will have full trading discretion over the individually managed portfolios. If individual securities or groups of securities are restricted, that portion of the account may be held in the Cash and Cash Equivalent portion of the manager's portfolio or alternate securities will be substituted.
- DVP trades cannot be placed on any actively-managed account.

### **Additional investments**

- 1. A self-service "Schedule Cash Receipt" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements).
- 2.If a check, wire, lockbox or ACAT cash is sent to SEI for deposit, the appropriate Managed Account Solutions Additional Investment Form can be submitted electronically via **SEIAdvisorCenter.com**. Investment instructions should not appear on the Account Transfer Form.
- 3. To change or add a manager, use a Managed Account Change in Investment Strategy Form.

#### For Managed portfolios

Unless otherwise indicated where the additional investment should be applied, additional investments will be placed into the overlay allocation. From the time the completed Additional Investment Form is received, it will take up to five business days to accommodate this transaction request and for resulting trades to settle. Some assets may take longer. Receipts under \$2,500 will be invested into Cash and Cash Equivalent.

#### For Equity Managers

The funding of the Equities Manager portfolio must be made according to the strategy selected. Specific managers of the strategy cannot be selected.

### **Cash disbursements**

A self-service "Disburse Cash" action is available at **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements). Or, the Managed Account Solutions Distribution Form can be submitted electronically via **SEIAdvisorCenter.com**.

Advisor's signature is required for check distribution and account closing requests to the name and address of record as well as transfers to an SEI account owned by the Investor; all other distribution and account closing requests, including distributions that are payable to an account owned by the Investor at another custodian or payable to a third party, must be signed by both the Investor (or, for qualified plan accounts, the Plan Sponsor or an authorized person designation by the Plan Sponsor) and the Advisor. A Standing Instructions Form may be submitted to allow an Advisor to authorize check, wire or ACH distributions to account(s) owned by the Investor(s); this form cannot be used for qualified plan accounts, 403(b (7) accounts, Personal Trust accounts, accounts that are pledged to an outside institution, or accounts from which distributions/ withdrawals are restricted. Unless specified, all liquidations will be funded from Cash and Cash Equivalent. Strategy Cash and Cash Equivalent does not include DCA or Holding Money Market. If there is not enough Cash and Cash Equivalent to cover the entire disbursement, cash will be raised according to your firm's default raise cash method across the current investment strategy.

If an account has a scheduled recurring disbursement and the account has enough Cash and Cash Equivalent to cover the entire disbursement amount five business days prior to the distribution, no trades will be placed. If there is not enough money in the account, the managers will be notified five business days prior to the disbursement date so that the amount of the distribution can be raised according to your firm's default raise cash method across the strategy. **Note:** Liquidating fixed-income securities may take longer depending on market conditions and liquidity. If you would like trades placed in a manner other than your firm's default raise cash method, please complete one of the following two steps:

- Submit a request on the appropriate Trade Form and indicate that the trades are to cover the upcoming scheduled disbursement. The request must be received by SPTC at least eight business days prior to the disbursement date. If the request is not received at least eight business days prior to the disbursement date or if the request does not indicate that the trades are to cover an upcoming scheduled distribution, trades according to your firm's default raise cash method may result.
- If you want only mutual funds to be sold to cover the scheduled disbursement and you do not wish to have trades placed so far in advance of the disbursement, contact the Managed Accounts Team at least eight business days prior to the disbursement date to indicate that you will be submitting a trade request to raise cash manually.

If a Managed Account falls below the indicated manager minimum balance (excluding market depreciation), active management will be turned off.

Upon receipt by 11:00 a.m.Eastern time of instruction to disburse cash from an Investor's account, an SPTC administrator will review the current Cash and Cash Equivalent balance. If a sufficient balance exists, SPTC will sell Cash and Cash Equivalent and distribute the cash on the day of receipt unless it is an account closing, in which case the transaction will follow the closing time frame.

If a sufficient Cash and Cash Equivalent balance does not exist and the request is received by 2:30 p.m. Eastern time, SPTC will raise cash overweight for rebalancing overlays and pro-rata based on market values for non-rebalancing overlays. Cash is disbursed on the day the trades settle (trades can take three to five business days to settle).

Provide recipient's street address, city, state and zip code for third-party distributions sent via wire or check.

Please see the Distribution Requirements Guide for specific distribution requirements due to divorce or death.

## Dividends

# Distributing income and dividends for managed account solutions

Income and dividends from individually managed portfolios are paid out sporadically in cash and cannot be reinvested into the individual security. However, cash can accrue in the managers' portfolios and will be managed accordingly. The Investor also has the option to transfer any income, dividends and interest to Cash and Cash Equivalent for periodic disbursements as specified on the Managed Account Solutions Distribution Form.

For review of basic dividend information see the Transaction Guidelines section.

# Investment strategy allocation changes

A self-service "Modify Investment Assignment" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements). Or, the Managed Account Solutions Change in Investment Strategy Form can be submitted electronically via **SEIAdvisorCenter.com**.

A self-service "Modify Investment Assignment" action is available on **SEIAdvisorCenter.com** (subject to Broker-dealer approval and firm-approved user entitlements) to change the asset allocation or manager allocations within an account. Or, the Managed Account Solutions Change in Investment Strategy Form can be submitted electronically via **SEIAdvisorCenter.com**. The account will be reallocated to the requested percentages, and the new allocation will be held as the Investor's target strategy until notified otherwise.

If you only wish to change one manager to another manager of the same style and same weighting, submit the Managed Account Solutions: Manager Change Form.

### **Money manager replacements**

In the event that SEI recommends the replacement of a money manager in the underlying individually managed account, SEI will notify the Investor and Advisor at least 30 days in advance. Investors' assets will be automatically transferred to the new money manager unless specifically instructed otherwise by the Investor. In the event an Investor does not want assets transferred to the new manager, upon notification to SPTC, the securities will remain in an unmanaged status.

### **Portfolio rebalancing**

The Advisor must provide, on the Managed Account Solutions Account Application (for new accounts), or the Change in Investment Strategy or Monetary Change Forms (for existing accounts), instructions detailing if the portfolio is to be rebalanced. If the account contains unmanaged securities, those assets will not be a part of the rebalancing process. Managed Accounts will rebalance quarterly.

Accounts are analyzed quarterly for deviations from target allocations on two levels:

- Overlay allocation
- Strategies within each individual portfolio

If rebalancing is not turned on for the Managed Strategy, cash will be raised or invested pro-rata across the strategy.



### **Discover SEI.**

SEI delivers technology and investment solutions that connect the financial services industry. With capabilities across investment processing, operations, and asset management, SEI works with corporations, financial institutions and professionals, and ultra-high-net-worth families to solve problems, manage change, and help protect assets—for growth today and in the future.

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### To contact us, call 800-SEI-1003

#### **Current clients**

For fast and effective service, authenticate by entering the last 5 digits of your **SEIAdvisorCenter.com** ID. Then, enter the last 4 digits of your TIN.

- Option 1 Operational and administrative support
- Option 2 Sales and case support
- Option 4 Assistance with any of SEI's technology tools
- Option 5 Questions regarding incoming asset transfers

#### New Advisor Clients and All Other Inquiries

Press pound (#)

#### Hours of Operation

SEI Private Trust Company

Service Teams: 8:30 a.m. to 7 p.m. Eastern time.

To access SEI 24 hours a day, log on to SEIAdvisorCenter.com