



Primary Compliance Disclosures (folders) to be submitted & maintained within Docupace beginning in 2021

Disclosure Activity

Frequency Approval Workflow

Client Event/Seminar/Advertisement Reimbursement Request	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance review
Correspondence* (Incoming and Outgoing) - excluding e-mail	Monthly	Rep enters > Field OSJ or Home Office Managing Principal review
Customer Complaint**	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance review
Gifts (Given or Received)***	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance review
Personal Investment Account Disclosure	As needed	Rep enters > Compliance review
Outside Business Activity Disclosure	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance/Registrations review
Political Contributions	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance review
Private Securities Transactions**** (excluding Independent RIA Activity Disclosures)	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance review
Product Provider Training Request	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance review
Social Networking and Website Disclosure	As needed	Rep enters > Field OSJ or Home Office Managing Principal review > Compliance review
Supervisory Logs (Field OSJ's only)	Monthly	Field OSJ enters > Home Office Managing Principal review
Independent RIA Activity Account Disclosures	As needed	Rep enters > Compliance review

Important Items of Note:

- 1.) Each disclosure form containing an existing registered representative signature field must continue to be signed by the representative either via a wet signature (printed/uploaded via docupace cover page) or via electronic signature (including an adobe digital signature or other e-signature).
- 2.) Correspondence* - If there is correspondence (outgoing or incoming) sent or received then it must be disclosed atleast monthly in Docupace. Effective for April 2021 and beyond, you are no longer required to disclose if there was no correspondence sent or received for the month.
- 3.) Customer Complaints** - Complaints should be immediately reported to your assigned Managing Principal **AND** the PCS Compliance Department. In no way should you ever attempt to resolve a complaint on your own without first reporting it and awaiting next steps.
- 4.) Gifts*** - If gifts related to business are given or received, details of those gifts should be submitted in Docupace on a timely basis. Details required are located on the Gift log form available in Docupace.

- 5a.) Beginning 1/4/2021, Weekly Check Logs and acknowledging no checks received are no longer required. Instead you must log checks into Docupace within 24 hrs of receipt which automatically creates a ongoing log of that activity for future reference. Securities received (physical certificates) should also be immediately logged into Docupace as received.
- 5b.) Check logs, Correspondence and Supervisory logs covering activities occurring in December 2020 may be entered into Quest up until mid-January 2021. All activities occurring during 2021 must be disclosed in Docupace going forward.
- 6.) Unlike with the Quest Portal, beginning 1/4/2021 all disclosure activities occurring thereafter and submitted through Docupace, may be relied on by the branch office as their official books and records. This means a branch office will no longer be required to maintain separate record of these folders/disclosures for inspection purposes outside of Docupace unless desired. Compliance related folders/disclosures maintained by branch offices pertaining to activities prior to 1/4/2021 should be kept only for historical archiving purposes.
- 7.) Private Securities Transactions**** - Pre-approval is required by PCS Compliance prior to participating in a private securities transaction. Details of the proposed transaction must be provided including: the desired investment amount, the future date of the investment, any and all promotional material used when considering the investment. You should not solicit clients to invest in a private securities transaction.