

Introduction: All affiliated persons who intend to share space with any person or entity not affiliated with the Firm must complete and submit this form to their designated supervisor and receive notification that the broker-dealer (Firm) does not object prior to engaging in any such activity.

Office sharing includes sharing space with any unaffiliated entity or person(s) (i.e., CPA, marketing firm, attorney). The definition of office sharing also includes a space that is occupied by your own outside business but contains individuals who are not affiliated with the Firm (i.e., the space is occupied by your CPA practice with tax preparers on site who are unaffiliated). To further define affiliated versus unaffiliated persons, please review the following definitions.

Definitions:

Affiliated persons include individuals who have been fingerprinted and are currently approved by the Firm.

Unaffiliated persons include individuals who have not been fingerprinted or approved by the Firm.

While sharing space with other persons or entities is allowed with Firm approval, it is important to understand the restrictions, safeguards and conditions to ensure the security of Firm client documents, information and books and records. Failure to disclose an office sharing arrangement prior to engaging in any such activity could result in disciplinary action, including termination.

Please complete this form if you intend to share office space, have changes to an existing office sharing arrangement or need to terminate a previously disclosed and approved office sharing arrangement. Once you complete this form, send it to your designated supervisor for review. Your designated supervisor will forward it to the Firm's Compliance for final review and consideration.

Section I: Request Information

Type of request: ☐ New – Establishing or reporting a new office sharing relationship
☐ Amendment – Changes to an existing/already approved arrangement
☐ Termination

Address of Space That Will be Shared	City	State	Zip Code
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Person in Charge of Branch	Anticipated Start Date of Office Sharing	Designated Supervisor
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1. Are you sharing space with anyone currently registered with another broker/dealer and/or registered investment adviser?

☐ Yes ☐ No

If yes, please list each individual name and the broker/dealer and/or registered investment adviser. (*IMPORTANT: Such office sharing arrangements are subject to additional scrutiny, and further requirements and policies will apply.*)

2. Please list all entities and/or individuals in this location that are not affiliated with the Firm:

Business/Individual Name: _____

Business Type: ☐ Insurance Agency ☐ Law Practice ☐ Tax Preparation/Accounting

☐ Other: _____



Business/Individual Name: _____

Business Type: ☐ Insurance Agency ☐ Law Practice ☐ Tax Preparation/Accounting

☐ Other: _____

Business/Individual Name: _____

Business Type: ☐ Insurance Agency ☐ Law Practice ☐ Tax Preparation/Accounting

☐ Other: _____

Business/Individual Name: _____

Business Type: ☐ Insurance Agency ☐ Law Practice ☐ Tax Preparation/Accounting

☐ Other: _____

3. Who is paying for the expenses for the location? _____

4. Are there any Firm-affiliated individuals associated with any of the entities listed in question 2 above? ☐ Yes ☐ No

If yes, please list each individual name and the entity with which they are associated:

5. Required: Please attach a diagram of the space, including offices, fax machine, printer, etc. ☐ Attached

Section II: Requirements and Policies

1. If sharing office staff with the individual(s)/entity(ies) named above, only the following functions may be shared by staff members who are not affiliated with the Firm:
 - a. Sorting mail
 - b. Answering phones
 - c. Greeting customers
 - d. General administrative functions that do not pertain to the Firm's business (i.e. Human Resources, payroll processing, etc.)
2. If located in an executive office suite (WeWork, Regus, Impact Hub, etc.), mail must be securely delivered and not left in an open, unsecured area (i.e. desk, open mail slot).
3. Firm-related mail may only be opened by individuals affiliated with the Firm.
4. Prior to entering into any referral arrangements, which include compensation, Firm-affiliated individuals must submit an Outside Business Activity (OBA) Disclosure form and receive approval from the Firm.
5. If the Firm's affiliated individual collects rent from the individual/entity named above, the Firm's affiliated individual must submit an OBA Disclosure form and receive approval from the Firm.
6. A clean desk policy is in place and used, shared, and tested for all within the location.
7. Confidential information must be stored and locked. This includes any books and records, paper, Post-it Notes, labels on files, etc. In case of doubt, the information should be locked. Keys to all filing cabinets/drawers containing sensitive information must be stored in a safe place.
8. Laptop computers must be stored in locked cabinets/drawers or secured to an immovable object with cable locks while unattended. Portable storage devices (i.e., memory sticks, thumb drives, external hard drives and backup drives) must be stored in locked cabinets/drawers when unattended.
9. The Firm's office must have a separate phone line or an automated phone tree that clearly identifies all businesses at this location. Those affiliated with the Firm will state their affiliation with the Firm when answering phone calls and on their individual voicemail.
10. If a server is utilized, any Firm-related information shared on the server must only be accessible by the Firm's affiliated individuals.
11. The internet connection may be shared, however, the Firm's affiliated individuals must have a separate password-protected Wi-Fi network name/connection, or they must use their personal mobile Hotspot/MiFi. For hardwired connections, the connection must be segmented where the Firm's affiliated individuals have their own zone/channel.

12. The network containing the Firm's information must only be accessible by the Firm's affiliated individuals.
13. If there are shared printers/copiers/fax machines located in open areas, each individual must have a unique code to release documents from the devices, and/or the Firm's affiliated individuals will follow the below steps when using the devices:
 - a. The individuals will stay at the printer/copier or fax machine for the duration of the job.
 - b. Documents should never be left unattended.
 - c. Job owners should clear the queue to prevent unauthorized individuals from viewing confidential information.
14. The Firm's affiliated individuals must adhere to the guidelines outlined in the Information Security Guidelines.

Submission of this form acknowledges that all individuals affiliated with the Firm will adhere to the above requirements and the Firm's policies to shared office space. If there are any items that require additional consideration, please include them below:

Please note that you may not share office space with any person or entity not affiliated with the Firm until you receive approval from the Firm's Compliance Department.

Print Person in Charge of Branch Name	Person in Charge of Branch Signature	Date
Print Designated Supervisor Name	Designated Supervisor Signature	Date

Home Office Compliance Review

Printed Home Office Reviewer Name	Home Office Reviewer Signature	Date
☐ Approved ☐ Approved with Conditions ☐ Denied		
Conditions for Approval or Rationale for Denial:		

You must retain a copy of the completed form in your books and records.