

**OFG FIDUCIARY DOCUMENTATION GUIDE**

**CUSTOMER NAME:** \_\_\_\_\_

**PROPOSED PRODUCT:** \_\_\_\_\_

OFG Registered Representatives (“RR’s”) should use this form for rollover and transfer transactions where an ERISA plan is involved. This form represents a guide to document the reasons this new investment product and/or this transaction is in the best interest of the customer. RR’s should provide documentation on a separate page addressing all of the items/questions mentioned in this guide, and attach the separate page to this document. RR’s need to provide a copy of this document and the attachment to the customer.

- List the investment products discussed with the customer. What investment product was ultimately decided upon?
- Document the factors that led to the purchase of this investment product vs. other products, and document the discussions with the customer about these factors. What is the customer’s intended use of this product?
- What were the approximate fees/expenses associated with the customer’s previous investment product(s) (where the money is coming from)? How do those fees/expenses compare to the fees/expenses on the new product(s)? Did the employer pay for any plan expenses? If the new fees/expenses are higher than previous, what are the overriding factors considered by the customer in desiring to transfer to the new investment product anyway? If the RR and the customer are not able to reasonably determine the fees/expenses from the previous investment product(s), please document this fact, document what attempts were made to determine those fees/expenses, and document an estimate of the approximate fees/expenses the customer most likely had on their previous product.
- What differences are there between the levels of service and the investment options of the previous investment product(s) vs. the new investment product? Did the customer previously have an investment representative to discuss their account with? What changes are there related to customer access to their account, ability to request changes/withdrawals, etc.? Does the customer have a desire to move their money away from an employer plan where they no longer work?
- What mutual fund or fixed investments were discussed with the customer, and which funds and investment allocation did the customer ultimately utilize? How do the funds and allocation fit in with the customer’s investment objectives, risk tolerance, time horizon, net worth, liquidity needs, and other factors? What were the discussions with the customer about this?
- What Share Class is being used, and why? What were the discussions with the customer on Share Class options and why is the Share Class selected in the customer’s best interest? (This should also be documented on the OFG Customer Account Record, or reference should be made from the CAR to this form).
- If utilizing an annuity product, please document the key features of the annuity and the discussions you had with the customer on these features, such as guaranteed income, death benefit considerations, what riders are being used and why, any surrender period, any potential surrender fees/charges, investment allocation considerations and limitations, any changes that can occur within the annuity (for example, if the account value goes to \$0), etc. Has the customer had another fixed or variable annuity exchange within the preceding 36 months?

**OFG Representative Name**

**OFG Representative Signature**

**Date**