GWN SECURITIES

Third-Party Asset Management Platform (TAMP)

& Employer-Sponsored Overlay Management Processing Guide

STANDARDIZED PAPERWORK, APPROVAL, AND FUNDING REQUIREMENTS

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AUDIENCE	GWN Investment Adviser Representatives

1. Purpose

This guide establishes the standardized process for opening and servicing business through approved Third-Party Asset Management Platforms (TAMPs) and approved Employer-Sponsored Overlay Management solutions that require the GWN TAMP Kit. It is designed to support complete, accurate submissions and consistent processing.

This guide applies to investment advisory business conducted by investment adviser representatives of GWN's registered investment adviser. GWN reviews and approves the TAMPs, programs, managers, strategies, and investment types made available through its advisory business.

Current resources: Refer to the Additional Advisory Solutions page on the GWN Advisor Portal for the current provider list, contacts, solution information, and approved-program inserts.

2. General Rules of Engagement

- **Approval and eligibility.** Confirm that the provider, proposed program, and advisor are approved before conducting business.
- **Licensing and training.** Advisors must be appropriately licensed to charge advisory fees and must complete all required training before using an approved program.
- **Complete documentation.** Complete all required provider paperwork, the GWN TAMP Kit, and any separately required custodian paperwork.
- **Submission before funding.** Submit complete and accurate paperwork to GWN New Business for review and approval before the account is funded.
- **Managed assets and billing.** Assets in a managed program must be managed and subject to fee billing. For providers other than AssetMark, excluded assets must be held in a separate NFS brokerage account. For AssetMark general securities accounts and excluded assets, confirm the applicable GWN requirements under the AssetMark section and separate processing guide.
- **Approved options.** Confirm that the proposed manager, investment type, strategy, or program appears on the current GWN-approved options sheet before recommending or submitting business. A program's appearance in a provider portal does not establish GWN approval.
- **Questions or exceptions.** Contact New Business before submitting incomplete paperwork or requesting an exception.

3. Approved Solutions Covered by This Guide

Third-Party Asset Management Platforms	Employer-Sponsored Overlay Management
AssetMark	AssetMark
Flexible Plan	Howard Capital Management
Mariner	Absolute Capital
Orion Portfolio Solutions	Pacific Financial Group
Pine Valley Investments	
SEI	

4. Processing Quick Reference

Use this grid as a routing reference. Provider-specific instructions and current forms control when requirements change.

Most providers accept wet signatures. Obtain the required client authentication and follow the signing method shown below. When DocuSign is used, include the Certificate of Completion (Audit Trail).

Provider / Program	Signing and Submission	Key Exceptions and Guidance
Orion	Orion provider packet and GWN packet submitted together	Some programs require Orion training. Follow the Orion Processing Guide.
AssetMark	AssetMark provider packet and GWN packet submitted together	Includes approved Employer-Sponsored Overlay solutions. Follow the AssetMark Processing Guide.
Mariner	Provider, separate custodian, and GWN paperwork submitted together	Obtain the required Mariner ID directly from Mariner before processing.
Pine Valley	Provider, separate custodian, and GWN paperwork submitted together through the required process	Follow current authentication requirements.
Flexible Plan	Use DocuSign and the standard GWN workflow	Use current provider forms and requirements.
SEI	Use DocuSign and the standard GWN workflow	Use current provider forms and requirements.
Employer-Sponsored Overlay solutions	Prior GWN approval is required. Complete provider and GWN paperwork; client-directed application may be required	Data feeds may not be available. Confirm provider-specific requirements.

Guide references: For Orion and AssetMark, follow the separate processing guide for the complete paperwork, authentication, submission, approval, and funding workflow.

5. Provider Details

Orion Portfolio Solutions

- Confirm the proposed Orion program is approved for use at GWN before initiating an ACAT to Orion. Some programs require program-specific training from Orion before use; complete all required training before recommending the program or submitting business.
- Submit the Orion provider packet and GWN paperwork at the same time.
- Submit GWN paperwork to New Business and obtain approval before account release or funding.
- Assets held in the managed account must be included in the managed program and subject to fee billing. Any asset or position excluded from management or advisory fee billing must be held in a separate NFS brokerage account.
- Only Tier 1 managers are approved for use through Orion Portfolio Solutions.
- Advisor as Portfolio Manager and certain Direct Indexing solutions require additional approval. Direct Indexing also requires a Series 7 in addition to fee-based licensing.
- **FOLLOW THE SEPARATE ORION PORTFOLIO SOLUTIONS PROCESSING GUIDE and the current Orion Approved Programs and Investment Options Sheet.**

AssetMark

- Complete the AssetMark provider packet and GWN paperwork as a coordinated submission.
- Download the completed AssetMark packet and submit it with the GWN paperwork.
- The GWN TAMP Kit and required GWN client authentication remain mandatory. Follow the separate AssetMark guide for transfer coding and DocuSign requirements.
- New Business releases the account after approval; approval is required before funding.
- Assets included in an AssetMark managed program must be managed and subject to advisory fee billing. General securities account availability and billing treatment are subject to GWN approval. Confirm the applicable requirements with GWN before opening an account or making changes to an existing account.
- Advisor-directed account management is not available through AssetMark.
- eWealthManager may display programs that are not approved for GWN use. Consult the current GWN-approved AssetMark sheet and the GWN restrictions documented by AssetMark.
- AssetMark also offers approved Employer-Sponsored Overlay Management solutions. Confirm the selected solution on the current approval sheet.
- For accounts custodied at Fidelity or Schwab, coordinate the required aggregation data connection with GWN and AssetMark. Follow the separate AssetMark guide for setup requirements.
- **FOLLOW THE SEPARATE ASSETMARK PROCESSING GUIDE and consult the current AssetMark Approved Programs and Investment Options Sheet before submitting business.**

Mariner

- **OBTAIN THE REQUIRED MARINER ID DIRECTLY FROM MARINER BEFORE PROCESSING.**
- Mariner provider forms do not include custodian paperwork. Submit the provider paperwork, separate custodian paperwork, and GWN paperwork together.
- Assets held in the managed account must be included in the managed program and subject to fee billing. Any asset or position excluded from management or advisory fee billing must be held in a separate NFS brokerage account.
- An approval letter is required before account setup.

Pine Valley Investments

- Use DocuSign for the Pine Valley provider packet.
- Pine Valley provider forms do not include custodian paperwork. Submit the provider paperwork, separate custodian paperwork, and GWN paperwork together.
- Knowledge-Based Authentication is required for the packet.
- Assets held in the managed account must be included in the managed program and subject to fee billing. Any asset or position excluded from management or advisory fee billing must be held in a separate NFS brokerage account.

Employer-Sponsored Overlay Management Solutions

- Absolute Capital, Howard Capital Management, and Pacific Financial Group follow the Employer-Sponsored Overlay Management workflow.
- Complete all provider paperwork, the GWN TAMP Kit, and any required custodian paperwork.
- Certain employer-sponsored overlay programs may require the client to initiate or direct the application process.
- GWN may not receive data feeds from Employer-Sponsored Overlay Management solution providers. Confirm reporting and data availability before use.
- Submit the complete package to New Business for approval before processing or funding.

Standard TAMP Processing

- Flexible Plan and SEI follow the standard GWN workflow.
- Use DocuSign for Flexible Plan and SEI, together with the provider's current forms and requirements.
- Include the DocuSign Certificate of Completion (Audit Trail) with the submission.
- Complete the provider paperwork and GWN TAMP Kit, and include custodian paperwork when applicable.
- Submit the complete package to New Business and await approval before processing or funding.

6. New TAMP Approval Process

Tim Askin is the owner of the intake process for requests involving a new TAMP or an unapproved program. Representatives must receive written GWN approval before recommending, submitting, or using the provider or program.

Minimum Provider Requirements

- At least $1 billion in assets under management.
- Registered with the U.S. Securities and Exchange Commission.
- Available for use in all states.
- At least five years in business.
- Able to provide and share information required for GWN's review and ongoing oversight.
- Willing to enter into a due diligence agreement with GWN.

Required Request Information

- Submit the provider's primary contact person, title, telephone number, and email address.
- Identify the broker-dealers, registered investment advisers, or other firms currently working with the provider.
- Describe the provider, proposed program or strategy, intended client use, investment types, custody arrangement, fees, billing method, trading authority, paperwork, training, reporting, and available data feeds.
- GWN conducts investment, operational, compliance, legal, technology, data, billing, and supervisory due diligence, as applicable.
- Approval is effective only after written confirmation and addition to the applicable approved-provider or approved-program sheet.