

Required Disclosures Table

Disclosure	What is it	When you Need it	Where to Find it	How to Deliver to Client
CRS	Part of SEC's Regulation Best Interest. Increased transparency to clients regarding the service available & fees/expenses they pay	<ul style="list-style-type: none"> When opening new commission or advisory account. (Includes direct & financial planning clients) Recommend rollover or new service for existing account or prospect <u>(FP affiliated with Cambridge & CIRA then provide Cambridge CRS and CIRA CRS)</u> 	<ul style="list-style-type: none"> Before you log in to CIR2.com, go to Form CRS Forms -> Compliance Forms 	<ul style="list-style-type: none"> In-person Mail/ Email DocuSign <p>Note: Must be first document provided to client</p>
ADV Part II A	Provides Information about the qualifications and business practices of Cambridge	<ul style="list-style-type: none"> When working with a new advisory client or requested by prospect 	<ul style="list-style-type: none"> Before you log in to CIR2.com, go to information for Investors -> Cambridge Disclosures -> CIRA Form ADV 2A CLIC -> Control Center->My Info -> ADV Brochure Forms -> Compliance Forms 	<ul style="list-style-type: none"> CIR delivers for Wealth Port Wrap accounts FP delivers for ADV Direct non-Wrap, Flexmap, TPMM & Financial planning & Consulting accts. <p><u>(Same delivery as ADV Pat II B)</u></p>
ADV Part II B	Provides background about Financial Professional whom they are opening the account with	<ul style="list-style-type: none"> When new advisory account is established or if requested by client or prospect <u>(If requested, must disclose on compliance log)</u> 	<ul style="list-style-type: none"> CLIC -> Control Center -> My Info -> ADV Brochure 	<ul style="list-style-type: none"> In-person Mail/ Email DocuSign
Reg BI Disclosure	<ul style="list-style-type: none"> Equivalent to ADV Part IIA for advisory accounts. Includes all types of commission accounts <p><i>(Not to be confused with BIA)</i></p>	<ul style="list-style-type: none"> When recommendation is made on new or existing commission account One time per client 	<ul style="list-style-type: none"> Before you log in to CIR2.com, go to Information for Investors -> Cambridge Disclosures Forms -> Compliance Forms 	<ul style="list-style-type: none"> In Person Mail/ Email DocuSign
BIA	Provides information on the consideration & analysis of best interest recommendation	<ul style="list-style-type: none"> All new accounts Rollover/transfers in existing qualified accounts. Prefix change CMAP *<u>Exception List Below</u> 	<ul style="list-style-type: none"> BIA – CLIC forms RightBRIDGE – CIR2.com Tool Grid 	<ul style="list-style-type: none"> In Person Mail/ Email DocuSign <p>Note: Webcapture for supervisory review</p>
Investment Analysis	Tool to document rationale & comparison. Why in the best interest of the client	<ul style="list-style-type: none"> All new accounts Required for transfer or rollovers for qualified accounts. Best practice submission for supervisory review not required but may be requested Analysis for all other accounts optional 	RightBRIDGE (Investment or Annuity Wizard) – CIR2.com Tool Grid **<u>Approved outside vendor analysis tool below</u>	<ul style="list-style-type: none"> In Person Mail/ Email DocuSign <p>Note: Save in client file</p> <p style="text-align: right;"><i>For Internal use only – 2/13/23 Advview 399770</i></p>

***Exception List**

***What account types/scenarios will not require a best interest analysis under Reg BI or DOL PTE 2020/02?**

- Financial professional change of B/d or RIA affiliation without changing investments, account type, strategy or compensation. (Includes authorization added to existing TEM accounts. (Does not include opening of TEM accounts or transferring to new TEM vendor.)
- IRIA that is using its own BIA and analysis documentation
- Group-level retirement plan (not owner-only)
- Corporate or entity account (if recommendation is not for personal/family use)
- Financial professional personal securities account
- Financial Planning Engagement or other standalone advice agreement
- Other home office or product company-related change.

****Approved outside vendor analysis tool**

** Approved outside vendor analysis report	
Advisor Center Portfolio End-client Report	SEI IPS
Advisor Center Scenario Tester End-Client Report	SEI Proposal
Fi360 Costs and Services Report	WealthPort Plan and Propose Income Proposal
Kwanti Report	WealthPort Plan and Propose IPS
Morningstar Advisor Work Station	WealthPort Plan and Propose Morningstar Comparison
Morningstar Annuity Intelligence	WealthPort Plan and Propose Morningstar Xray
Orion Proposal	WealthPort Plan and Propose Proposal
Riskalyze Alternative Proposal	Ycharts
Riskalyze Portfolio Stats Comparison	<i>Adview 399770 For Internal use only – 2/13/23</i>

- **When delivering disclosures via email here is the language you can use:**

The Securities and Exchange Commission (SEC) has adopted “Regulation Best Interest” (Reg BI). Reg BI established a best interest standard of conduct for broker-dealers (ours is Cambridge) and associated persons (investment advisors and financial professionals) when they make a recommendation to a retail customer (you) of any securities transaction or investment strategy involving securities, including recommendations of types of accounts. As part of the rulemaking package, effective 7/1/20 the SEC also adopted new rules requiring that we deliver various disclosures pertinent to the recommendations you received.

- [Form CRS – RIA](#)
- [Form CRS – BD](#)
- [Reg BI Disclosure](#)
- [ADV II A](#)
- ADV II B (this must be an attachment unless you add it to your website, in which case you can provide the link)
- [BIA Form](#)

- **Helpful Links**

[DOL BI ad DOL PTE Actions Chart](#)

[RightBRIDGE Worksheet when offline](#)

[Navigating RightBRIDGE User Guide](#)

[Sample Product Profiler Report](#)

- **Recorded Trainings**

[RightBRIDGE Product Profiler Training](#)

[RightBRIDGE Annuity Wizard Training](#)