

Non-Registered Fingerprint Person Association Kit

Kit Components:

- ES0748 - Non-Registered Fingerprinted (NRF) Person Fingerprinting Instructions
- ES0464 - Non-Registered Persons Processing Request
- ES0722 - Non-Registered Personnel Technology Access Request
- ES0463 - Non-Registered Persons Disclosure
- ES0466 - Non-Registered Persons Background Authorization
- ES0733 - Non-Registered Fingerprinted Person ("NRF") Acknowledgement

As part of the registration process, FINRA requires that fingerprints be collected so that a criminal background check can be performed through the FBI. Equity Services currently uses Fieldprint (BIG), an electronic fingerprint administration service. This eliminates the need for obtaining multiple hard copy fingerprint cards, as well as speeds up the registration process. All fingerprints are transmitted electronically to FINRA, reducing the rate of illegible cards.

How to Begin:

Please visit www.brokerfp.com. Select the "Sign Up" button to register for a new account. Keep track of the username and password that are created. In the event that a fingerprint appointment needs to be rescheduled, you'll need the log in credentials created to log back in to pick a new appointment. During the scheduling process you will be asked to enter an "Fieldprint Code", at which time **FPEquity1** should be used. It is critical that code is used and not anything else, as that is what ensures the fingerprints are electronically sent to the Equity Services queue online so they may be submitted to FINRA.

To Schedule Your Appointment:

When scheduling your appointment, you will be asked to enter demographic information as required by FINRA. Please be very careful to enter all information accurately, and as it appears on your form of identification (such as a driver's license or passport). SSN, date of birth, and full legal name must be entered correctly. You will be asked to pick a location to have the fingerprints taken, a date and time for the appointment, and for payment (the cost of fingerprinting is \$17.50). Once you have signed up for an appointment, please ensure you print/save your confirmation as it contains helpful information to prepare for your appointment, and details what you must bring with you on the day of.

Fieldprint Location:

The appointment confirmation you receive will contain the address and phone number of the location the individual has chosen to have the fingerprints taken. Be sure to arrive on time and with all identification and documentation needed for your appointment. Once the fingerprints are taken, they will be electronically submitted to Equity Services and we will be able to see them in our online queue. That allows us to move onto the next step in associating the individual with the agency they are supporting.

FAQs:

Why does ESI require NRFs to be fingerprinted?

The purpose of fingerprinting is to ensure that individuals that have access to or, are handling securities related information, do not have any type of criminal history that would otherwise prevent them from engaging in the securities business. This includes, but is not limited to felony pleas or convictions, forgery, larceny, etc.

Who is subject to the fingerprinting requirement?

Individuals subject to be fingerprinted are any individuals (both registered reps and NRFs) who, in connection with securities products (including variable insurance products), handle checks or other customer funds, have access to cash, or have access to the broker-dealer's original books and records (i.e. applications, blotters, etc.). This requirement also applies to the immediate supervisors of such individuals. *(Examples of a person subject to fingerprinting would be Operations personnel in a field office who processes variable life and mutual fund transactions, or, an assistant to a registered rep who assists in mailing applications and checks and assists in maintaining records related to securities business.)*

Who is NOT subject to the fingerprinting requirement?

Personnel that are not involved in handling securities business and have no access to ESI records (i.e. do not have keys to locked drawers, do not handle incoming/outgoing securities client mail, or do not have passwords to computer files containing ESI records) do not need to be fingerprinted.

Please note that ESI must treat information obtained from fingerprint background checks with strict confidentiality. The only situation where background information may be disclosed to a person's supervisor would be in instances involving prior convictions for felony offenses, property-related misdemeanors, or investment-related violations. These specific violations may prevent an individual's continued involvement in handling ESI paperwork or National Life's variable products paperwork. Other information obtained from fingerprint cards will be held in the strictest confidence within the ESI Licensing and Compliance department.

Applicant's Information

Name: _____ Agency Name/#: _____

Job Position/Title: _____ Start Date: _____

Business Address (where individual will be physically working from): _____ Business Phone: _____

_____ Cell Phone (needed for User Provisioning/web access): _____

Supervisor's Name: _____

Please check all item(s) that apply to the applicant's job duties

- ☐ Handle checks or other customer funds
- ☐ Have access to cash
- ☐ Have access to ESI's original books and records (blotters, client files, etc.)

E-mail Requirement * (check one)

- ☐ I currently have an email address on the corporate server
- ☐ Please establish an email address on the corporate server

**If individual will be using a vanity email address, the appropriate form and steps must be completed prior to the vanity email being used for business correspondence.*

Fingerprint Requirement

- ☐ Make an appointment with Fieldprint® to complete the fingerprinting (Fieldprint® will submit fingerprints electronically to ESI.)

Required document checklist (all items must be completed and sent to ESI Licensing)

- ☐ ESI Non-Registered Persons Disclosure Form
- ☐ Authorization to Conduct FINRA/CRD Background Investigation Form
- ☐ ESI Non-Registered Personnel Processing Request Form
- ☐ ESI Non-Registered Personnel Technology Access Request Form
- ☐ \$35 check (made payable to ESI and mail separately to ESI Licensing, One National Life Drive, Montpelier, VT 05604)
- OR
- ☐ \$35 Commission Deduction from hiring representative or BOS. Must have pending ESI commissions available.
- 5 Digit Rep Code to charge: _____

I hereby certify that the above information is true and accurate to the best of my knowledge.

Signature: _____ Date: (mm/dd/yyyy) _____

NRF access to ESI platforms and resources will be granted once the affiliation has been completed with FINRA and ESI. **(Form must be signed by all representatives authorizing access. If request is for agency level access, the agency supervisor must sign.)**

NRF Name: _____ Agency: _____

Access Requested for: ☐ Agency Level ☐ Only Advisor(s) listed:

For each platforms/system listed below, please select Yes or No if the NRF will require access:

Wealthscape - ESI's brokerage platform

☐ Yes ☐ No

Docupace - ESI's electronic business processing platform

☐ Yes ☐ No

Illuminations - ESI's proprietary Advisory platform

☐ Yes ☐ No

Investigo - ESI's data aggregation and consolidated statement platform

☐ Yes ☐ No

MoneyGuidePro - ESI's Investment Adviser Representative financial planning software

☐ Yes ☐ No

Global Relay - ESI's compliant texting solution (Additional fees will apply)

☐ Yes ☐ No

I understand that as a non-registered fingerprinted individual, I will have access to information that is for internal use only. I will not utilize this information for any personal investment decisions, nor will I disseminate any information to others. I understand the site(s) will maintain corporate information that must be treated in a confidential manner.

NRF Name (please print)

NRF Signature

Date

I/We authorize technology platform access as outlined above for the referenced non-registered personnel.

Rep/Supervisor Name (please print)

Rep/Supervisor Signature

Date

Rep/Supervisor Name (please print)

Rep/Supervisor Signature

Date

Rep/Supervisor Name (please print)

Rep/Supervisor Signature

Date

Name: _____ Branch No.: _____

Social Security No.: _____ BOS: _____

Work Telephone No.: _____ Employing Rep #: _____

These questions must be answered in conjunction with the submission of fingerprint cards for non-registered employees. Any 'Yes' answer must be explained in the space provided below. If additional space is needed, please attach a separate sheet of paper.

1. Have you been convicted of, pled guilty or nolo contendere (no contest) in a domestic, foreign or military court to any felony within the last 10 years? ☐ Yes ☐ No
2. Within the last 10 years, have you been convicted of, pled guilty or nolo contendere (no contest) in a domestic, foreign or military court to a misdemeanor that could result in your statutory disqualification (such as misdemeanors involving securities, taking a false oath or making a false report, bribery, perjury, burglary, larceny, theft, robbery, extortion, counterfeiting, misappropriation of funds, or substantially equivalent activity)? ☐ Yes ☐ No
3. Has the SEC, CFTC, another Federal or state regulatory agency (including securities, banking, or insurance), a foreign financial regulatory authority, the National Credit Union Administration, or a self-regulatory organization (such as FINRA, NYSE, or other exchanges) ever found you to have violated their rules, or have any of these agencies imposed a final order that bars or otherwise disciplines you? ☐ Yes ☐ No
4. Has any domestic or foreign court ever:
 - enjoined you in connection with any investment-related activity; ☐ Yes ☐ No
 - found that you were involved in a violation of any investment-related statute(s) or regulation(s); or ☐ Yes ☐ No
 - dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you by a state or foreign financial regulatory authority? ☐ Yes ☐ No
5. Are you named in any pending investment-related civil action that could result in a yes answer to any part of question #4? ☐ Yes ☐ No
6. Are you presently named in any customer complaint, arbitration, or lawsuit, or do you have a copy of any complaint that has not been previously submitted to the firm? ☐ Yes ☐ No
7. Have you been the subject of a disciplinary action by a professional organization such as bar association, association of CPAs, etc.? ☐ Yes ☐ No
8. Have you filed for bankruptcy or been the subject of an involuntary bankruptcy petition? ☐ Yes ☐ No
9. Do you have any unsatisfied judgments or liens against you? ☐ Yes ☐ No
10. Has a bonding company ever denied, paid out on, or revoked a bond for you? ☐ Yes ☐ No

Remarks _____

I hereby certify that the above information is true and accurate to the best of my knowledge.

Signature: _____ Date: (mm/dd/yyyy) _____

I hereby authorize and request any present or former employer, school, police department, financial institution or other person having personal knowledge about me, to furnish Equity Services, Inc. with any and all information in their possession regarding me in connection with the handling of funds, books and/or records on behalf of Equity Services, Inc. I am willing that a photocopy of this authorization be accepted with the same authority as the original, and I specifically waive any written authorization request.

I authorize the jurisdictions, SROs, and the designated entity, to give any information they may have concerning me to Equity Services, Inc. and I release the jurisdictions, SROs, and Equity Services, Inc., and any person acting on their behalf from any and all liability of whatever nature by reason of furnishing such information.

I authorize all my employers and any other person to furnish to Equity Services, Inc., or any agent acting on its behalf, any information they have, including without limitation my creditworthiness, character, ability, business activities, educational background, general reputation, history of my employment and, in the case of former employers, complete reasons for my termination. Moreover, I release each employer, former employer and each other person from any and all liability, of whatever nature, by reason of furnishing any of the above information. I recognize that I may be the subject of an investigative consumer report and waive any requirement of notification with respect to any investigative consumer report ordered by Equity Services, Inc. I understand that I have the right to request complete and accurate disclosure of the requested investigative consumer report.

Signature of Applicant:

Date: (mm/dd/yyyy)

Social Security No.:

Printed Name

Date of Birth: (mm/dd/yyyy)

Home Address:

Non-Registered Fingerprinted ("NRF") Acknowledgement

Non-registered office staff with access to ESI books and records or customer funds/securities must be fingerprinted and undergo a background check. The purpose of fingerprinting is to ensure that non-registered fingerprinted ("NRF") persons handling securities-related records in field offices do not have certain types of criminal history that render them statutorily disqualified from engaging in the securities business.

Any staff that has access to office records, systems, equipment, or mail must be fingerprinted because they have **access** to ESI books and records, monies, or securities. This includes administrative or mail room staff, receptionists, temporary employees, and summer or short-term interns. ESI books and records include, but are not limited to: office records, client files, product/account applications, transaction blotters/activity logs, customer checks, stock certificates, agency systems or equipment, correspondence, advertising, or mail.

Permitted Activities:

Subject to the direction and supervision of the NRF's supervisor, the NRF may:

- Respond to client inquiries regarding the client's account, including providing general information about the client's account (If any other person not authorized by the account is requesting information about a client's account - for example, the client's spouse, attorney, CPA, or any other person - the NRF must consult his or her supervisor before responding to such requests);
- Provide general administrative service to clients and prospects, including answering general administrative or clerical questions (e.g., greeting clients, scheduling appointments, accepting checks/securities in a clerical capacity for processing).
- Logging, filing, and maintaining ESI books and records within the office (e.g. blotter, correspondence, complaints, etc.)

As an "NRF" with ESI, I understand that I cannot:

- Solicit any securities business.
- Execute transactions.
- Give investment advice.
- Receive any securities commissions or other compensation based on the sale of a securities product.
- Be listed as "representative of record" on any securities or advisory accounts.
- Share passwords in any capacity.
- Use any email address other than an ESI approved address to handle any business correspondence.
- Text regarding any business-related item unless signed up with the firm approved texting provider. This includes both the public as well as internal communication.

I understand that as an associated person of ESI, I will have access to ESI information that is for internal use only. I understand that all information related to ESI, including but not limited to client information, must be treated in a confidential manner.

Signature of Non-Registered Fingerprinted Person

Date

Printed Name of Non-Registered Fingerprinted Person