

Regulation Best Interest Actions Chart

		CRS ¹ Delivery	Complete BIA Tool in CLIC	Document Best Interest Rationale for Recommendation in Client File	Reg BI Disclosure	ADV 2A or WRAP Brochure	Investment Exchange Disclosure	Product-specific Disclosures (VAD, VUL, EIAD, AI, 529)
Account type	Action							
CMAP	New account	Yes: Cambridge and CIRA ²	Yes	Yes	No	ADV 2A/2B, if client has not previously received	If applicable	If applicable (i.e. 529)
	Existing account rebalance, investment or model change, reinvest cash, etc.	No	No	Best practice	No	No	No	No
	Existing account change of discretion, add options trading or margin	Yes: Cambridge and CIRA ²	No	Best practice	No	No	No	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	No	No	If applicable	If applicable (i.e. 529)
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Cambridge and CIRA ²	Yes, if into new account	Yes	No	No	If applicable	No

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Account type	Action							
WealthPort® WRAP (UMA, advisor-directed, team-directed, CAAP® ⁴)	New account	Yes: Cambridge and CIRA ²	Yes	Yes	No	Wrap Brochure/ ADV2B, if client has not previously received	If applicable	If applicable (i.e. 529)
	Existing account rebalance, investment or model change, reinvest cash, etc.	No	No	Best practice	No	No	No	No
	Existing account add options trading or margin	Yes: Cambridge and CIRA ²	No	Best practice	No	No	No	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	No	No	If applicable	If applicable (i.e. 529)
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Cambridge and CIRA ²	Yes, if into new account	Yes	No	No	If applicable	No
	Strategist change	No	No	Best practice	No	No	No	No

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Account type	Action							
FlexMAP or third-party manager platform advisor-directed (including SDBA or TEMP)	New Account	Yes: Both Cambridge and CIRA ³	Yes	Yes	No	ADV 2A/2B, if client has not previously received	If applicable	No
	Existing account rebalance, investment or model change, reinvest cash, etc.	No	No	Best practice	No	No	No	No
	Existing account change of discretion, add options trading or margin	Yes: Both Cambridge and CIRA ³	No	Best practice	No	No	No	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	No	No	If applicable	No
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Both Cambridge and CIRA ³	Yes, if into new account	Yes	No	No	If applicable	No

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Third-party managed	New Account	Yes: Both Cambridge and CIRA ³	Yes	Yes	No	ADV 2A/2B, if client has not previously received	If applicable	No
	Existing account rebalance, investment or model change, reinvest cash, etc.	No	No	Best practice	No	No	No	No
	Existing account add options trading or margin	Yes: Both Cambridge and CIRA ³	No	Best practice	No	No	No	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	No	No	If applicable	No
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Both Cambridge and CIRA ³	Yes, if into new account	Yes	No	No	If applicable	No
	Strategist change	Yes, if it changes account number or platform, both Cambridge and CIRA ³	Yes, if it changes account number or platform	Best practice	No	No	No	No

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Account type	Action							
Commission brokerage	New account	Yes: Cambridge and CIRA ²	Yes	Yes	Yes, if client has not received previously	No	If applicable	If applicable
	Existing account rebalance, investment or model change, reinvest cash, etc.	No	No	Yes, if new commission is received	Yes, if client has not received previously	No	If applicable	No
	Existing account add options trading or margin	Yes: Cambridge and CIRA ²	No	Yes	Yes, if client has not received previously	No	No	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	Yes, if client has not received previously	No	If applicable	If applicable
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Cambridge and CIRA ²	Yes, if into new account	Yes	Yes, if client has not received previously	No	If applicable	No
	New buy, sell, explicit hold recommendation	No	No	Yes	Yes, if client has not received previously	No	If applicable	If applicable
	Purchase of "check and application" product held outside of the brokerage account	Yes: Cambridge and CIRA ²	Yes, this is considered a new direct account	Yes	Yes, if client has not received previously	No	If applicable	If applicable

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Account type	Action							
Directly held mutual fund (including 529 plans)	New account	Yes: Cambridge and CIRA ²	Yes	Yes	Yes, if client has not received previously	No	If applicable	If applicable
	Existing account rebalance, exchange within fund family, investment or model change, reinvest cash, etc.	Yes, if new commission is received, both Cambridge and CIRA ²	No	Yes	Yes, if client has not received previously	No	If applicable	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	Yes, if client has not received previously	No	If applicable	If applicable
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Cambridge and CIRA ²	If into new account	Yes	Yes, if client has not received previously	No	If applicable	If applicable
	New buy, sell, explicit hold recommendation	No	No	Yes	Yes, if client has not received previously	No	If applicable	If applicable

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Account type	Action							
Commission variable and fixed indexed insurance product	New account	Yes: Cambridge and CIRA ²	Yes	Yes	Yes, if client has not received previously	No	No (part of VAD, VUL, EIAD)	Yes
	Existing account subaccount rebalance, investment or model change, reinvest cash, etc.	No	No	Yes, if new commission is received	Yes, if client has not received previously	No	No	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	Yes, if client has not received previously	No	No (part of VAD, VUL, EIAD)	If applicable
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Cambridge and CIRA ²	Yes, if into new account	Yes	Yes, if client has not received previously	No	No (part of VAD, VUL, EIAD)	If applicable
	New buy, sell, explicit hold recommendation	No	No	Yes	Yes, if client has not received previously	No	No (part of VAD, VUL, EIAD)	If applicable

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Account type	Action							
Fee based variable and fixed indexed insurance product	New account	Yes: Both Cambridge and CIRA ³	Yes	Yes	Yes, if applicable	ADV 2A/2B, if client has not previously received	No (part of VAD, VUL, EIAD)	Yes
	Existing account subaccount rebalance, investment or model change, reinvest cash, etc.	No	No	Best practice	No	No	No	No
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	No	No	No (part of VAD, VUL, EIAD)	If applicable
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Both Cambridge and CIRA ³	Yes, if into new account	Yes	No	No	No (part of VAD, VUL, EIAD)	If applicable

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Account type	Action							
Commission alternative investment	New account (product sale)	Yes: Cambridge and CIRA ²	Yes	Yes	Yes, if client has not received previously	No	No (part of AI Disclosure)	Yes
	Existing account recommendation for deposit (not systematic/periodic/ regular retirement contribution)	No	No	Yes	Yes, if client has not received previously	No	No (part of AI Disclosure)	Yes
	Rollover recommendation (not ongoing systematic or residual deposits)	Yes: Cambridge and CIRA ²	No	Yes	Yes, if client has not received previously	No	No (part of AI Disclosure)	Yes
	New buy, sell, explicit hold recommendation	No	No	Yes	Yes, if client has not received previously	No	No (part of AI Disclosure)	If applicable
Account type	Action							
Financial planning engagement (FPE)	New FPE/new services	Yes: Both Cambridge and CIRA ³	No	Best practice	No	ADV 2A/2B, if client has not previously received	No	No

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Retirement plan participant advice addendum (RPPA) or financial wellness consulting addendum (FWCA)	New RPPA under a Group Retirement Plan (408(b)(2), 3(21), or 3(38)) agreement or new FWCA under a Financial Wellness Consulting Agreement	Yes: Both Cambridge and CIRA ³	No	Best practice	No	ADV 2A/2B, if client has not previously received	No	No
Account type	Action							
Group or entity agreements	Retirement plan or business consulting engagement, Financial Wellness Consulting Engagement, Seminar Attendee Agreement, 408(b)(2)/3(21)/3(38) fiduciary agreements	No	No	No	No	ADV 2A/2B, if client has not previously received	No	No

¹All financial professionals must document date of instances of CRS delivery in the client's file. Financial professionals affiliated with an SEC-registered IRIA must provide the IRIA's Form CRS in addition to the forms above. Some stages require state-registered IRIAs to file and deliver a Form CRS, if affiliated with a state-registered IRIA, check your state's requirements.

² If Cambridge and IRIA, only Cambridge disclosure is required

³ If CIRA-only, the CIRA form is required, but not the Cambridge form. If Cambridge and IRIA affiliated, Cambridge form is required, but not the CIRA form. If IRIA-only, neither the Cambridge, nor the CIRA form is required.

⁴ CAAP® is a registered mark of Cambridge Investment Research, Inc. for its program for investment purposes



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