RESPONSE TO REQUEST FOR PROPOSAL
The Palmer Family of Companies

July 31, 2019

Questions

1. Firm History and 401(k) Experience

a. *Provide a brief history of your firm including size, volume of business, locations, number of years in business, and business philosophy.*

Lawley Retirement Advisors, LLC (LRA) is a limited liability corporation owned by Lawley Benefits Group, the employee benefits division of Lawley Service, Inc. Lawley Benefits Group provides comprehensive employee benefits consulting including medical insurance, group insurance, wellness programs, and cafeteria plan consulting.

LRA has been providing retirement plan services as a Registered Investment Advisor (RIA) since the firm's inception in 2011. Prior to the firm's inception, Lawley Benefits Group provided retirement plan services for over 20 years through our broker/dealer, Cadaret, Grant & Co., Inc.

As an RIA, our firm acts as an ERISA 3(21) or 3(38) co-fiduciary for all plans with which we consult, both to the Plan Sponsor as well as to the plan's participants. Our role is to coordinate all aspects of your retirement plan and ensure that your plan is designed and implemented solely in the best interest of plan participants.

The LRA team consists of 7 dedicated team members, 3 of which are retirement plan consultants who provide our core fiduciary services. The remaining 4 members are part of the service team; 3 are dedicated to Plan Sponsors; and 1 serves in an administrative capacity.

LRA currently manages 125 plans in excess of $900,000,000 in assets across the United States. Our clients are predominantly located in Upstate New York and may have locations across North America and overseas. LRA works with 23 different retirement plan recordkeepers and 9 different third-party administrators (TPA's).

Exhibit 1 – How Can We Help You
Exhibit 2 – How Can Our Team Help You
Exhibit 3 – Forms ADV Part 2A & ADV Part 2B

b. *Describe the visibility and influence of your firm in the employee benefits field.*

Securities offered through Cadaret, Grant & Co., Inc. Member FINRA/SIPC. Advisory services offered through Lawley Retirement Advisors, LLC, an SEC Registered Investment Advisor. Lawley Retirement Advisors, LLC and Cadaret, Grant & Co., Inc. are separate entities.

Lawley Service, Inc. is a privately held, family owned insurance broker who is consistently recognized as one of the top 100 Brokers in the United States. Lawley Benefits Group, as a division of Lawley Service, has more than 100 employees providing expertise in all aspects of employee benefits including health insurance, group benefits, and retirement plans.

LRA's local presence, combined team experience, and singular focus on retirement plans enables LRA to provide our clients with exceptional value-added services such as regularly scheduled plan reviews, targeted education plans, and regular plan benchmarking. Our firm also hosts a semi-annual Retirement Roundtable attended by a select group of our Plan Sponsors who meet to share best practice ideas and discuss timely topics with a variety of guest speakers. LRA also provides on-site fiduciary training and periodic communications via email discussing pending legislation updates and retirement industry trends. Additionally, we offer regularly scheduled webinars and other client events throughout the year as well as publish a monthly newsletter as an additional method of connecting with our clients.

Exhibit 4 – Lawley Service Overview

2. Account Team Qualifications

a. Provide an overview of the account team that would be assigned to The Palmer Family of Companies. For each member of the team, provide highlights outlining qualifications and experience. Provide a summary of roles and distribution of responsibilities.

The below LRA team members would be the primary account team for The Palmer Family of Companies:

Todd Tevens, Managing Director & Retirement Plan Advisor
Accredited Investment Fiduciary®
Certified Plan Fiduciary Advisor
Member of National Association of Plan Advisors (NAPA)
20 years industry experience; 6 years with LRA
FINRA Series 7 & 66 licensed
NYS Life, Accident, & Health Insurance licensed

- Conducts investment due diligence reviews to ensure optimal Plan performance
- Provides the Retirement Plan Committee with Plan design recommendations as necessary
- Provides detailed investment analysis and direction to the Retirement Plan Committee with regard to investment changes
- Develops and directs comprehensive employee communication and education strategies to optimize participant outcomes
- Educates fiduciaries on best practices in Plan administration and industry trends
- Works with participants to assist with asset allocation and retirement income planning needs

Angela Rea, Retirement Account Executive and Service Team Lead
Accredited Investment Fiduciary®
11 years industry experience; 3 years with LRA
FINRA Series 7 & 66 licensed
NYS Life, Accident, & Health Insurance licensed

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- Serves as primary day-to-day contact
- Consults with the Retirement Plan Committee with regard to Plan design
- Provides investment reporting and analysis
- Communicates legislative updates to the Retirement Plan Committee
- Provides comprehensive employee communication and education strategies
- Works with participants to assist with asset allocation and retirement income planning needs

Lindsay Georger, Administrative Assistant
2 years industry experience, 2 years with LRA
FINRA Series 6 licensed

- Provides administrative support to the LRA team
- Maintains and updates filing and CRM systems
- Prepares material for client review
- Manages scheduling of external and internal calendars

Exhibit 3 – Forms ADV Part 2A & ADV Part 2B
Exhibit 5 – Account Team

b. Describe your approach to the ongoing training of your staff.

The advisors and staff at LRA are continuously working to maintain the highest level of knowledge within the retirement industry. Training for the LRA team includes annual conferences with industry providers and leaders focusing on market trends and industry updates, access to the Lawley Service Inc.'s corporate "Lawley University" for ongoing career development, monthly meetings with industry providers to maintain a working knowledge of new solutions and trends, internal monthly team meetings, and internal individual monthly one-on-one meetings.

3. Clients

a. Describe at least two innovative strategic solutions you have implemented for clients similar to The Palmer Family of Companies that highlight your benefits consulting expertise.

Hazmat Environmental Group, Inc.
National transporter of chemical by-products in various transportation vehicles; approximately 343 total active participants

Upon engagement as the 3(21) co-fiduciary for the Hazmat retirement Plan, LRA coordinated a formal recordkeeper RFP in 2016. In addition, LRA facilitated and attended finalist presentations from two plan providers and assisted the Retirement Plan Committee with the decision making process by providing a proprietary scoring system. LRA coordinated the Plan's transition to a new provider and was able to negotiate a 65% total plan cost reduction. LRA implemented a zero-revenue sharing investment lineup that permitted total fee transparency for both the Plan Sponsor and the participants.

LRA presented the Retirement Plan Committee with employer match options with the goal of strengthening the retirement plan's design, allowing for maximum key employee contributions, and increasing the recruitment and retention efforts of the Plan Sponsor.

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<u>Koike Aronson, Inc.</u>
Manufacturers of high quality metal cutting, welding, and positioning equipment; approximately 130 total active participants

Upon engagement as the 3(21) co-fiduciary for the Koike retirement Plan, LRA coordinated the following Plan design changes to meet the goals and objectives of the Retirement Plan Committee.

- Increased deferral limit from 16% of pay to 100% of pay up to the annual IRS limit.
- Added the Roth (after-tax) deferral option.
- Added automatic enrollment at 6% of pay for all new employees with an automatic increase of 1% of pay annually up to a maximum of 12% of pay, as well as a one-time sweep for employees deferring less than 6%; these automatic features have a 95% persistency rate.
- Added several distribution options for those terminated or retired participants, providing participants with the ultimate flexibility at separation of service and/or retirement.
- Adjusted the employer contribution to be a Safe Harbor 3% contribution with the addition of a 1% profit sharing contribution for all employees to allow for maximum key employee contributions.

In addition to the above-mentioned Plan design changes, LRA provided Koike with the unique target date series option. This target date series couples risk-based and target-date based investing by offering 3 separate glidepaths: conservative, moderate, and aggressive. Due to the added level of choice for participants, LRA held individual meetings with all of the employees to determine suitable investment allocations for each participant.

Finally, with the changes to the investment lineup and advisory fee reduction, LRA brought Koike a total Plan cost reduction of approximately 21%.

b. Describe your internal mechanism for ensuring customer satisfaction with your services.

LRA utilizes several internal mechanisms for ensuring our clients are satisfied with our services. The first is a brief annual survey we provide our clients that directly asks (1) if they are satisfied with our services and (2) if there is any notable feedback they can provide our team. We then review the results of this survey and make any necessary changes to our service model.

The second mechanism we use is a schedule of touchpoints, catered to each individual client to ensure that any needs of our client's Plan administration are being met in between scheduled meetings.

A third mechanism we use to ensure customer satisfaction is a formal stewardship report. This report summarizes the major services LRA has provided our clients since the inception of the relationship and is reviewed on an annual basis.

A fourth mechanism we use is SalesForce, our Client Relationship Management software. This software allows us to aggregate our client data, store documents on a cloud-based platform, coordinate schedules, and utilize timetracking tools.

c. Provide contact names and phone numbers of # reference.

<u>Hazmat Environmental Group, Inc.</u>

Dan Dintino
Chief Operating Officer
(716) 432-1412
Dan.dintino@kenworthne.com

Koike Aronson, Inc.

Rachael Becht
Human Resources & Safety Manager
(585) 492-2400
bechtr@koike.com

Nick Adams
Chief Financial Officer
(585) 492-2400
adamsn@koike.com

4. Services

a. Provide an overview of your approach to strategic planning.

LRA has an unbiased and independent approach to strategic planning. We develop and maintain an annual strategic calendar of events that is catered toward each client and their needs. We act as the primary point of contact for the Plan Sponsor and Recordkeeper to maintain open and constant lines of communication in the relationship. Internally, we meet monthly as a team to review outstanding service needs for all of our clients as well as to discuss internal development and initiatives.

Exhibit 6 – Sample Strategic Calendar

b. Provide an overview of your account support and administration services, including enrollment coordination and ongoing support for The Palmer Family of Companies' employees.

Working with LRA, our clients are assigned an account team with 3 members who serve as day-to-day contacts. This account team is comprised of a lead advisor, a relationship manager, and an administrative assistant who are responsible for maintaining the strategic calendar as well as the co-fiduciary core services listed below.

As a co-fiduciary, our core services include:

- Comprehensive Fiduciary Compliance Consulting
- Investment Selection and Monitoring
- Total Plan Cost Disclosure & Review
- Independent Plan Design Analysis
- Employee Engagement Services

LRA can accommodate both group and individual employee education meetings. LRA is able to easily adapt to the varying industries in which our clients operate by providing remote or local education meetings in large groups or small, and in virtually any type of workplace environment. Our team will deliver customized education based on the specific participant demographics of each client in order to enhance the education in group settings as well as on an individual basis as needed. Our team utilizes provider educational materials, investment performance, as well as customized presentations.

Our ongoing client support also includes:

- Regular/Semi-annual Retirement Plan Committee Meetings
- Quarterly Investment Reporting
- Creation and adoption of an Investment Policy Statement

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Periodic plan cost benchmarking
Legislative and marketplace updates
Annual fiduciary training for the Retirement Plan Committee
Compilation of Committee meeting minutes
Periodic group and/or individual employee education sessions
Access to online Fiduciary Briefcase storage for all related documents
Annual Plan audit support

Finally, working with LRA gives our clients access to our semi-annual Roundtable events, monthly newsletters, and quarterly webinars.

Exhibit 1 – How Can We Help You
Exhibit 6 – Sample Strategic Calendar
Exhibit 7 – How Can We Help Your Employees
Exhibit 8 – Sample Compliance Calendar
Exhibit 9 – Sample Committee Meeting Minutes
Exhibit 10 – Sample Fiduciary Benchmark Report
Exhibit 11 – RPAG Fiduciary Investment Review
Exhibit 12 – RPAG Fiduciary Fitness Overview

c. Describe your capabilities in ongoing plan performance monitoring, plan performance forecasting, benchmarking, and reporting.

As a either a 3(21) or 3(38) fiduciary, LRA has a duty to act in the best interest of our clients and their participants and beneficiaries. Our investment consulting includes recordkeeper, third-party, and internal proprietary research and is unbiased and independent. The variety of industry tools we use to evaluate the performance of fund managers on qualitative and quantitative variables include Retirement Plan Advisory Group (RPAG), Morningstar, fi360, modeling software provided by multiple investment research firms, and outside Target Date Fund analysis. In addition, we have built proprietary screening and benchmark reporting.

LRA conducts annual, semi-annual, or quarterly Committee Plan Review meetings based on the needs of our clients and a portion of these meetings always includes an investment performance review. If a(n) investment(s) is placed on an internal watch list, LRA may recommend reviewing the investments again after a designated period of time to determine an appropriate course of action. LRA always reviews the investments within the guidelines of the Retirement Plan Committee's executed Investment Policy Statement.

Exhibit 10 – Sample Fiduciary Benchmark Report
Exhibit 11 – RPAG Fiduciary Investment Review
Exhibit 13 – Sample Investment Policy Statement

d. Describe your capabilities in employee communications and education specifically geared towards a 24/7 operation.

LRA relies on the use of technology for educational purposes in a 24/7 operation setting, but will accommodate on-site meetings or live webinars as necessary with the Plan Sponsor. We have the ability to provide articulates for customized on-demand employee e-learning through voice recorded presentations as well as pre-recorded webinars. We can easily provide access to the recordkeeper's customer service center and provide customized employee promotional material and communications.

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LRA provides our contact information to plan participants at all education sessions and with all employee communications. We encourage participants to lean on us and contact us with any questions.

e. Describe your use of technology to support online employee services and education.

LRA utilizes various technology mediums to service the participants of our Plan Sponsors. This includes: scheduled educational webinars for those employees who may work offsite, recorded articulates for on-demand education, as well as demonstrations of any recordkeeper website and/or mobile app tools and resources.

We also offer our Plan Sponsors EduKate, an online subscription software that provides catered and holistic financial wellness education for employees, and in-depth reporting and monitoring capabilities for Plan Sponsors.

Exhibit 14 – EduKate Overview

f. Describe any additional service options that may be of interest to The Palmer Family of Companies.

LRA's key strength and competitive advantage centers on the fact that our team of 7 professionals are dedicated exclusively to the retirement plan industry.

Many advisors in the industry are restricted by the recordkeepers that they can work with; being an independent advisor, we have no restrictions placed upon our firm regarding the recordkeepers or third-party administrators with whom we can work. The strong working relationships we have built with 23 retirement plan providers allow us to have unique insight into the challenges faced by both Plan Sponsors and participants so that we may better address those needs from a fiduciary standpoint.

LRA has designed a proprietary Financial Wellness program that we are able to offer our clients. Our program is a 4-part series that covers budgeting, debt management, saving for the future, and protecting the future in a way that encourages employees to save and invest in their financial future beyond their workplace savings plan.

LRA is a member firm of the national Retirement Plan Advisory Group (RPAG). RPAG has $300 billion in assets under management, serving 35,000 Plan Sponsors, and 400 advisory partnerships on their platform. Our affiliation with RPAG provides our clients with access to ERISA specialists and professional expertise for all faces of our client's benefits programs. RPAG provides LRA with custom investment analytic tools, fee benchmarking support, committee and participant engagement tools, and Collective Investment Trusts (CITs) and target date fund solutions. The CITs are pooled investment vehicles specifically designed for qualified sponsored retirement plans that allow employees to obtain quality investment performance at exceptionally low costs.

Given our partnership with Lawley Benefits group and the proliferation of Health Savings Accounts, we work with HSA Bank to offer to educate our Plan Sponsors regarding the potential benefits of offering Health Savings Accounts as well as offer web-based Health Savings Account investment options. Through this partnership, we have the ability to assist with the monitoring of investment options within a participant's Health Savings Account and coordinate with their 401(k) account.

Exhibit 15 – Financial Wellness Overview
Exhibit 16 – RPAG Exclusive Collective Investment Trusts
Exhibit 17 – Health Savings Accounts

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5. Compensation

a. Describe how you expect to be compensated for the services outlined in this proposal.

LRA is a fee-only RIA and does not charge nor accept commission for any services. Our fee structure for fiduciary advisor support is negotiated on a per-client basis. We do not receive any form of additional compensation or benefits and provide written agreement and annual review of all advisory fees. Our fee can either be paid by the participants via the plan's assets, by the Plan Sponsor, or a combination of the two.

Exhibit 18 – Investment Advisory Agreement

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