REQUEST FOR PROPOSAL – RETIREMENT PLAN ADVISORY SERVICES

COMPANY SUMMARY

Whiting Door Manufacturing Corp (Company) is the world's leading designer and supplier of overhead roll-up doors for the transportation industry. Whiting maintains production operations in Akron, NY and Ontario, CA. It sells to commercial truck and trailer manufacturers and fleet operators. Having invented the first practical roll-up door in 1953, the Company has since expanded to offer swing doors and custom laminated products used in a variety of applications. Whiting employs over 450 people at its three facilities and its 2022 annual revenues are expected to exceed $120 million. More information can be obtained at its website www.whitingdoor.com.

The Company maintains two defined contribution plans. Whiting Door Manufacturing Corp 401(k) Retirement Plan for Non-Bargaining Unit Employees (NBU Plan) has 206 members and $22 million of assets. It is a safe harbor plan where the Company contributes a fixed percentage as well as match employee contributions. Whiting Door Manufacturing Corp 401(k) Retirement Plan for Bargaining Unit Employees (BU Plan) has 355 members and $7 million of assets. The Company makes a fixed per hour contribution with employee contributions.

The Plans are governed by a fiduciary committee (Committee) consisting of ownership and key management. Current service providers include:

Plan Consultant: Walsh Duffield Retirement Plan Solutions

Plan Trustee and Investment Custodian: Principal Trust Company

Legal Counsel: Harter Secrest & Emery LLP

Auditor: Tronconi Segarra & Associates LLP

INFORMATION ABOUT THE RFP PROCESS

The information contained in this RFP is confidential and proprietary. The information is to be used and discussed with only those employees who need to know the information contained herein in order to prepare your company's proposal. You agree not to publish, disclose or divulge any information provided or made available to you to any persons, firms, corporations or entities. Regardless of whether or not you choose to submit a proposal, this paragraph shall remain in effect indefinitely and shall continue to apply to the use or disclosure of information.

This RFP is not an offer to contract, nor should it be construed as such. Issuance of this RFP, your preparation and submission of a response, and the subsequent receipt and evaluation of your response by the Committee do not commit the Committee to award a contract to any offer, even if all of the requirements stated in the RFP are met. The Committee and the plans will be bound only if and when an agreement is executed with a candidate, and only in accordance with the terms and conditions contained in such agreement.

However, you should understand that your response to this RFP constitutes an offer to do business on the terms stated in your response and that, should a contract be awarded to you, the Committee may, at its option, incorporate all or any part of your response to this RFP in the contract. The Committee reserves the right to accept your offer without further discussions and without any additional opportunity for you to amend, supplement or revise your submitted offer. By submitting your response you agree that all responses to this RFP shall become the property of the Committee.

This RFP does not commit or obligate the Committee, the plans or the Company to pay any expenses incurred by you in the preparation of your response.

Please respond to this RFP by completing the questionnaire below in the order provided. You may supply such additional documentation as is requested or that you believe will be helpful, but such items should be provided as supplements to the questionnaire, not in lieu of completing it.

INFORMATION REQUEST 1: ABOUT YOUR FIRM

1. **Firm Name**: Lawley Retirement Advisors, LLC
2. **Address**: 361 Delaware Ave Buffalo, NY 14206
3. **Contact for this RFP**:

   James Rehak Jr. AIF, ChFC, CLU, REBC, CPFA

   Founder, Managing Director & Retirement Plan Advisor

   Phone: 716-849-8219

   Fax: 716-849-8245

   Email: jrehak@lawleyretirement.com

4. **Describe the ownership and structure of your firm.**

Lawley Retirement Advisors, LLC (LRA) is a limited liability corporation owned by Lawley LLC.

5. **List your firm's lines of business** (including affiliated companies).

Lawley LLC. provides comprehensive property & casualty, specialty insurance and employee benefits consulting including medical insurance, group insurance, wellness programs, and comprehensive retirement services.

   a. **If your firm is affiliated with any other organizations (e.g., a brokerage firm, asset manager, insurance company or other), please describe the relationship in full, describe any anticipated involvement of the affiliated organization in services to be provided to our plans, and explain the safeguards against conflicts of interest.**

On 1/1/2022 Lawley purchased 50% interest in Georgetown Capital Group, a local wealth management company that provides of individual financial planning to 1,500 clients. In 2022, this business partnership will be known as Georgetown-Lawley.

6. **How many years has your firm been in business?**

LRA has been providing retirement plan consulting services as a Registered Investment Advisor (RIA) since the firm's inception in 2011.

7. **Briefly describe your firm's history.**

   a. **How many years has your firm been servicing retirement plan clients**?

Lawley Benefits Group began offering retirement plan consulting services in 2000, initially offered through our independent broker/dealer, Cadaret, Grant & Co., Inc. In 2010, Lawley Retirement Advisors RIA was formed.

   b. **What documentation of your firm's history servicing retirement plan clients can you provide?**

Due to compliance and privacy reasons we will not provide documents that contain sensitive information. Please see a copy of Lawley Retirement Advisors LLC, Part 2A of Form ADV Brochure that indicate firm inception year.

Exhibit 1- Lawley Retirement Advisors LLC Firm Brochure- ADV Part 2A

8. **What is the total number of employees in the firm?**

The LRA team currently consists of 9 dedicated team members, 5 of which are retirement plan consultants who provide our core fiduciary services. Three members of our team are dedicated account executives and 1 client service specialist for all clients.

a. **Of those, number of employees who are Investment Advisory Representatives (IAR)?**

All 5 team members who serve as retirement plan consultants are Investment Advisory Representatives.

b. **Do you use sub-contractors?**

No

c. **If Yes, who and for what services?**

N/A

9. **What is the position of your firm in the employer-sponsored retirement plans business?**

Lawley Retirement Advisors is ranked among the National Association of Retirement Advisors (NAPA) Top 100 DC Advisor Teams.

In Western New York, we are in the top 5 firms by retirement plan assets under management

a. **Percentage of revenue is from retirement plan investment advisory service?**

LRA acts solely as a fiduciary advisor, 100% of firm revenue is from qualified retirement plans.

b. **Plan assets under advisement.**

$1,600,000,000 assets under advisement.

c. **Total number of clients with defined contribution plans under your advisement (401(k)/403(b)/401(a) Profit Sharing/ 401(a) Profit Sharing or Money purchase other than 401(k) plans, Government 457, 457(b), and 457(f) plans).**

LRA currently manages 154 plans in excess of $1,600,000,000 in assets across the United States. Our clients are predominantly located in Upstate New York and many have locations across North America and overseas.

d. **Number of core client plans (with whom your firm have regular quarterly contact).**

We do not distinguish between core and non-core accounts. As fiduciaries to all of our clients we follow a strict protocol of communication & process. Frequency of meetings is determined by plan sponsor committee. The majority of our clients have a minimum of quarterly contact. Larger plans and engaged plan committees do require more attention from LRA.

e. **Number of client plans added over the past 24 months.**

LRA has added 22 new plans over the previous 24 months.

f. **Number of clients lost over the past 24 months and the reasons client left**.

LRA maintains a 98% retention rate for our clients. Lost business is usually the result of a merger or acquisition.

g. **Number of clients to whom you act as a §3(21) adviser**.

LRA maintains a service standard of acting as a 3(21) co-fiduciary advisor to all plans.

h. **Number of clients to whom you act as a §3(38) manager**.

We have the capability to act as 3(38) if requested. Only one client has hired LRA to act as a 3(38) investment manager.

i. **Publications your firm has created or contributed**.

None

j. **Recognition received from independent sources demonstrating expertise and credibility.**

- National Assoc. of Plan Advisors (NAPA) – Top 100 Retirement Teams – 2019, 2020, 2021
- Retirement Plan Advisory Group (RPAG) – Elite Team Status
- Fidelity Concierge Advisor
- Principal Elite Advisory Team
- ADP Broker Partner

10. **Please list the types of services your firm offers for retirement plans**.

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. We have core services for both the plan sponsor and participants.

<u>Plan Sponsor</u>

- Fiduciary Governance & Documentation
- Investment Menu Due Diligence
  - QDIA, Target Date Fund analysis
- Fee Benchmarking
- Provider Search/RFP
- Committee Plan Review Meetings
- Plan Design Analysis

<u>Participant</u>

- Enrollment Meetings
- One on One/ Individual Meetings
- General & Targeted Education
- Financial Wellness
- Incoming rollover support
- Customized Education Website
- Recorded Articulates

11. **Please describe your firm's experience helping clients through the following**:

a. **Department of Labor audits**

LRA cannot provide legal or tax advice but we can assist our clients in preparing reports and information as part of their response to the DOL.

b. **Internal Revenue Service audits**

LRA cannot provide legal or tax advice but we can assist our clients in preparing reports and information as part of their response to the IRS.

c. **Voluntary compliance actions**

If a client is expected to submit through the voluntary compliance program, we will facilitate information & service requests from recordkeepers and administrators. LRA will not submit a voluntary correction on behalf of our clients.

d. Partial plan termination determinations

LRA has had very few clients experience partial plan terminations. In March 2020, at the onset of the COVID-19 pandemic, many clients in severely affected industries (i.e. hospitality, restaurant) had to resort to layoffs and furloughs that could have resulted in partial plan terminations. We quickly communicated with our clients to ensure they understood the implications.

e. Plan mergers or spin-offs

Many of our client's experience mergers and spin-offs throughout the maturity of their business. We facilitate conversations with the recordkeeper and administrator that include plan document & census updates. We also conduct education for employees to ensure a smooth and comfortable transition for all.

f. Corrective contributions

Our firm is most familiar with the steps necessary in correcting late or missed deposits via lost earnings calculation. Similar to question C. above, LRA can assist by pulling historical transitions, participant records and reports to facilitate the service request with the recordkeeper to determine the amount to be remitted by the employer. LRA will not submit the final file on behalf of our clients.

12. Describe what differentiates your firm from other advisory firms.

Expertise: LRA's dedicated team of 9 has over 100+ years of combined industry experience specializing in retirement plan consulting.

Service: Our service model is strategically constructed to provide plan sponsors and employees with multiple contacts & resources to enhance overall plan success. LRA has developed a process and service standard to ensure plan sponsors and committee members are meeting their fiduciary responsibilities.

Innovative: Planning for retirement can be complex and employees have expressed the importance of advice and guidance to help reach their goals. Our commitment to engagement, focus on participant outcomes, and innovative approach to employee education results in increased retirement readiness.

Strength: Lawley Retirement Advisors, LLC is a member of Retirement Plan Advisory Group (RPAG). RPAG is a national alliance of accomplished advisors whose precision and ingenuity produce enhanced value for sponsors and participants in employer-sponsored retirement plans. RPAG provides us with an extensive team of retirement plan and ERISA experts and a comprehensive practice management platform that we utilize. As an RPAG member firm, we're able to combine our local resources and expertise with the national resources of NFP's Institutional Consulting Group.

13. How does your firm define and measure the success of retirement plan consulting relationships?

Our firm defines success by improving participant outcomes (i.e. retirement readiness, healthy contribution and participation rates) by adhering to a fiduciary standard of care that mitigates liability for the plan sponsor. As a co-fiduciary our interests are aligned with the plan sponsor and participants of the plan and ensuring success and cultivating a lasting relationship is one of our core values.

14. **Please list the federal, state, and other regulatory agencies with which your firm is licensed or registered, and the type of license held.**

The advisor team hold various FINRA licenses including 6, 7, 24, 63, 65, 66.

Our Account Executives hold various FINA licenses including; 6, 7, 66.

Five members hold Life, Accident and Health (LAH) insurance licensed.

Our team members hold various designations including; Certified Plan Fiduciary Advisor (CPFA), Certified Financial Planner (CFP), Accredited Investment Fiduciary (AIF), Chartered Financial Consultant (ChFC), Chartered Life Underwriter (CLU) and Registered Employee Benefits Consultant (REBC).

a. **Please indicate which employees are not registered or licensed, and why**.

All advisors and account executives are fully registered with the SEC & FINRA.

15. **Have any individuals from your firm ever been disciplined by any government regulator for unethical or improper conduct or been sued by a client who was not happy with the work performed by the firm?**

No disciplinary actions by any regulatory agency have been made against LRA or its employees. In addition, LRA has not been sued by clients for unsatisfactory performance.

16. **Has your firm or any advisor of your firm been found guilty of any violation or paid any fines because of violations of securities regulations or ERISA?**

No violations have occurred.

17. **Please provide information concerning the level of insurance coverages, including General Business Liability, Umbrella coverage over and above the General Liability, Cybersecurity Liability, Errors & Omissions-Professional Liability, Fiduciary Insurance and ERISA Fidelity Bond.**

LRA has both a Professional and Crime insurance policy as well as an Errors and Omissions insurance policy, up to $1,000,000 each. Each individual advisor is covered under their own E&O policy. Carrier of coverage is Aon Risk Services Northwest, Inc.

18. **Does your firm work with client plans on an advisory basis?**

Our firm acts as an ERISA 3(21) or 3(38) co-fiduciary for all plans with which we consult, both to the plan as well as to the plan's participants

a. Is your firm a Registered Investment Advisor? If so, please provide a copy of both parts of your firm's most recent SEC Form ADV.

Lawley Retirement Advisors, LLC is registered as an investment advisor with the Securities and Exchange Commission under the Investment Advisor Act of 1940.

Exhibit 1- Lawley Retirement Advisors LLC Firm Brochure- ADV Part 2A

19. **Does your firm work with clients on a commission basis?**

Approximately 10% of our clients are commission-based compensation and 90% of our clients have an agreed upon fee.

20. **Please provide a current list of representative clients**.

We are not at liberty to disclose private client information.

21. **Please list four reference clients similar to our organization in terms of size.**

Taylor Devices
90 Taylor Drive
North Tonawanda, NY 14120
Mark McDonough – (716) 694-0800

Eastman Machine Company
779 Washington Street
Buffalo, NY 14206
Steve Calzi – (716) 856-2200

IMA Life
2175 Military Road
Tonawanda, NY 14150
Valaine Perez – (716) 695-6354

ZWILLING J.A. Henckels
270 Marble Ave
Pleasantville, NY 10570
Greg Smith – (914) 747-0300

INFORMATION REQUEST 2: SERVICE TEAM

1. **Describe your service model to our plans (staff, responsibilities, interactions with our plan, location of consultants assigned to our plans, frequency of in-person meetings, frequency of conference calls, team dynamics). Please include biographies for team members responsible for servicing our plans**.

Designated Team for Whiting Door Manufacturing Corp.:

- James Rehak Jr. – Lead Advisor
- Laura Cooley – Retirement Plan Advisor
- JP Rehak – Retirement Plan Advisor
- Erik Gorenflo – Account Executive
- Darlene Markowski – Client Service Specialist

(All team members listed are located in Buffalo, NY)

Team Responsibilities:

Advisor Team

- Investment menu oversight
- Coordinate employee education policy
- Lead committee plan reviews
- Plan governance consulting
- Plan design guidance
- Evaluate reasonableness of plan fees

Service Team

- Leads client service initiatives
- Supports employee outreach & inquiries
- Coordinates with recordkeeper for all plan related needs.
- Attends plan review meetings, delivers minutes and tracks action items

2. **Will the service team be the only people with whom we will be working? If no, please provide information on the extended team**.

Your designated advisor and service team members will be Whiting Door Manufacturing Committee's point of contact. Internal discussion will determine back-up and assistance if deemed necessary.

3. **Please explain the compensation arrangements applicable to the service team who would be assigned to our plans, including particularly any incentive compensation arrangements (compensation amounts need not be disclosed).**

There are no compensation incentives for service team members.

INFORMATION REQUEST 3: INVESTMENT SERVICES

1. **Describe your firm's approach to 401(k) plan investment consulting**.

Lawley Retirement Advisors utilizes a multi-manager fund approach in which we screen the universe of mutual funds to build a well-diversified lineup that is customized to each client. We continually screen and monitor these funds to ensure that they meet the criteria stated in the Investment Policy Statement (IPS). LRA ensures our clients meet the comply with ERISA 404(c) requirements.

2. **What investment policy statement support (creation and monitoring) do you offer?**

LRA has worked with external counsel to develop an Investment Policy Statement to outline the parameters to guide the Committee in the selection and monitoring of investments. After taking input from the Committee, the document will specify the tools used to measure performance and the metrics to consider prior to placing funds on watch-lists and or formal replacement of funds. This guiding statement will follow directly with our investment scoring process. The IPS is reviewed annually and amended whenever deemed appropriate.

Exhibit 2- Sample Investment Policy Statement

3. **What tools/process does your firm use to evaluate and monitor investment funds and managers?**

Lawley Retirement Advisors uses various industry tools to evaluate the performance of fund managers across a number of quantitative and qualitative variables. These systems include Retirement Plan Advisory Group (RPAG) Fiduciary Investment Review, Morningstar Advisor Workstation, Broadridge/Fi360, and various investment company Target Date Fund analysis tools. We have a structed & prudent internal due diligence process for continually monitoring investments.

a. **Are any of these tools are proprietary or internally developed?**

LRA has not created proprietary tools. Our decades of experience have allowed us to develop best practices to ensure a prudent process is followed when monitoring investments.

4. **Describe your investment research resources and capabilities.**

As noted in question 3 above LRA subscribes to software that includes Retirement Plan Advisory Group (RPAG), Morningstar and Fi360 for performing due diligence, screening and monitoring of investments. Given our large asset base across all clients, we are consistently in contact with asset management teams to discuss the most up to date commentary and detailed fund performance.

a. **How are investment benchmarks determined?**

Mutual Funds and Collective Investment Trusts (CIT) are benchmarked against the appropriate index most closely aligned to the asset class.

b. **Is your investment research proprietary?**

We do not conduct proprietary investment research.

5. How often do you hold performance review meetings with clients and what reports do they receive?

Meeting frequency is determined by the committee. LRA would recommend meeting no less that semi-annually or as frequently as quarterly.

The Advisor(s) and Account Executive will attend each Plan Review meeting. Quarterly or semi-annual 401(k) Committee Plan Review Meetings begin with a review of the last meeting minutes, and completed or open action items. The advisor and account executive will review and provide commentary on the Provider Plan Review Report, which include plan performance metrics such as; participation rate, deferral rate and plan assets. There will also be an evaluation of the Fee Summary including the investment expense, recordkeeper, administrator, and Lawley Retirement Advisors fees. All Plan Review Meetings include an investment menu performance and due diligence review. These meetings also include setting goals for employee education and engagement as well as legislative updates.

Exhibit 3 – SAMPLE Committee Agenda

Exhibit 4 – SAMPLE Committee Meeting Minutes

Exhibit 5 – SAMPLE Principal Executive Summary

Exhibit 6 – SAMPLE Principal Fee Summary

Exhibit 7 – SAMPLE 408(b)(2) Notice 2021

Exhibit 8 – SAMPLE RPAG Fiduciary Investment Review

Exhibit 9 – SAMPLE RPAG Target Date Fund Analysis

6. Do you have an investment watch list and what is your termination recommendation process?

Watch lists are client specific and termination procedures are outlined in the Investment Policy Statement (IPS).

7. What actions do you take when investments are not performing?

LRA monitors investments for a variety of quantitative and qualitative factors. If a fund begins to demonstrate inability to meet the guidelines outlined in the Committee's Investment Policy Statement, the fund will be placed on a Committee watch list. Continued failure over multiple quarters to meet the guidelines will merit a placement on an official watch list, pending potential replacement. Fund commentary, fact sheets and research on alternative funds are performed. The process is documented in meeting minutes.

8. Provide a sample of a written recommendation provided to a client

"The Core Bond Fund scores 6. The fund fails R-squared, Risk/Return, Up/Down Capture, and Information Ratio. This is the second quarter the fund has scored a watch list score. The composition of the fund was reviewed, including both short- and long-term performance. It was deemed prudent to place the fund on watch list and continue to monitor ongoing for improving analytics."

9. **Will your firm offer investment advice to our plans.**

Yes, LRA will serve as a 3(21)(a) investment advice fiduciary with the option to serve as a 3(38) fiduciary.

10. **Please describe your firm's ability and experience in negotiating and obtaining superior pricing on behalf of your clients.**

One of the cornerstones of our practice is benchmarking plan fees and negotiating on behalf of our clients. We are experienced in requesting and reviewing service provider proposals. This includes:

- Investment menu requirements (i.e. Stable Value, Proprietary Target Date Funds)
- Participant services (i.e. Enrollment, website features, webinars and online resources)
- Procedures and controls to ensure the plan sponsor follows & completes compliance tasks
- Additional services that relate to the participant experience (i.e. recordkeeper managed account solutions, financial wellness)
- Detailed description of compensation, fees (indirect or direct) and revenue sharing arrangements.

Our expertise in the retirement plan industry has afforded us strong relationships across many recordkeepers. We understand how each recordkeeper is uniquely positioned to offer price advantages given the plan demographics.

LRA utilizes software to:

- Facilitate RFP requests and aggregate responses and
- Provide a stand-alone fee benchmark report that compares your plan with a peer group universe aligned with participant and asset size.

INFORMATION REQUEST 4: PARTICIPANT SERVICES

1. **Please list the types of services your firm provides to retirement plan participants, including with respect to communications with participants regarding plan investments and/or plan participation generally.**

- Group Education (in-person or virtual)
  - Targeted Group Education (i.e. Social Security, Medicare, Life Stage)
- One-on-one meetings (Individual)
- Recorded articulates
- Dedicated benefits information hub
- Day to day service support
- Rollover assistance
- Monthly communication flyers

2. **Do you offer advice/education?**

Per the list in question 1, yes, we do offer/prepare education material for meetings we are expected to conduct. We will also work with the recordkeeper to coordinate onsite sessions, such as RetireSecure meetings through Principal.

a. **If so, how often?**

At a minimum, one group session and one day of individual meetings annually. This is subject to change per the direction provided by the Plan Sponsor and other services coordinated from the recordkeeper.

3. **Do you offer model allocations?**

LRA does not create proprietary models that we oversee ourselves. However, in some of our plans we do implement model solutions that are managed at the recordkeeper level, for example, RetireView models through Principal Financial Group. Decision to add models should always be in the best interest of the plan and its participants. This option can be further explored and discussed at plan review meetings.

4. **What resources do you have dedicated to participants?**

The list in question one is representative of materials and services we provide to participants.

5. **Please provide 2 specific examples of ways in which your firm has made a positive impact on retirement plans you support over the past 24 months (For example: increased participation, increased deferrals, enhanced services, lowered fees)**

Please note we cannot disclose client name of examples provided

1) Through the dates of December 10th 2021 – January 16th 2022, LRA conducted 286 one-on-one meetings and 10 group meetings with an existing client. This Syracuse based company has roughly 400 employees and $35 million in plan assets. The impact of these meetings with participants are outlined below:

- 95 participants increased contribution
- 63 participants updated beneficiary
- 24 participants moved to Roth
- 4 participants inquired about rollover support
- 3 participants inquired about loan assistance

2) LRA was hired as retirement plan advisor in Dec 2019 and our primary initiative was to update the investment menu and review the revenue sharing arrangements with the recordkeeper. The client did not have an Investment Policy Statement (IPS) in place so there was no process for review, watch list and replacement of investments. We formalized and implemented an IPS, where 4 funds were immediately placed on the watch list.

A thorough review of the revenue sharing built into the investment share class confirmed the recordkeeper was retaining the full amount. The committee requested a proposal from the recordkeeper for a move to a zero-revenue share class and replacement and mapping of the 4 funds on our watch list. The proposal offered a savings of 10 basis points on the investment expense and no change in the recordkeeping fee. LRA ran a benchmark report and fee study and requested a concession from the recordkeeper. The recordkeeper agreed to a 4-basis point reduction immediately and the committee accepted the proposal effectively reducing the plan costs by 14 basis points. In late 2021, we negotiated another 4-basis point reduction from the recordkeeper.

INFORMATION REQUEST 5: PROVIDER/VENDOR SERVICES

1. **Describe your vendor benchmark service and process.**

LRA utilize software through Retirement Plan Advisory Group (RPAG) and Fiduciary Decisions. This software will provide a stand-alone fee benchmark report that compares your plan with a peer group universe aligned with participant and asset size. It will generate results of fee ranges and averages across all costs components of a plan- investments, advisor, recordkeeper and if applicable administrator and/or trust services. A detailed list of services provided are also factored into the benchmark reports. LRA will compare these reports with current fee summaries from the recordkeepers and determine if there are opportunities to negotiate and/or request price reductions.

Exhibit 10 – SAMPLE Fiduciary Decisions Benchmarking Report

2. **Describe your service provider search RFP service and process.**

We are an independent firm and the decision to include a recordkeeper on a vendor search takes into consideration plan demographic, services requested, technology needs, and overall objective of plan.

LRA will facilitate RFP requests and aggregate responses through Retirement Plan Advisory Group (RPAG) electronic portal.

The Committee will meet to review the responses. The top 3 recordkeepers selected will be invited to present to the Committee as a finalist. From there, the Committee will meet to make a final decision. LRA will document all meetings to ensure the Committee can demonstrate that a prudent process was followed.

3. **In the past 36 months, how many Third-Party Administrators (TPA) / Recordkeeping / Trustee searches have you conducted for the DC and DB plans your firm supports?**

39 RFP's have been conducted

   a. **How many of these resulted in a change?**

25 resulted in a change. The most common reason(s) for a change in services is lack of provider engagement or need for fee restructuring. All decisions were made in collaboration with the Committee involved.

   b. **List the top three TPA/Recordkeeping Trustees that you have recommended?**

Principal, Fidelity, Empower

4. **With how many different service providers does your firm work to support current clients?**

LRA has relationships with 21 recordkeepers, 7 third party administrators and 6 payroll providers.

5. **What experience do you have with Principal Trust Company?**

Principal represents the largest share of assets and total plans within LRA's book of business. Due to the strength of this relationship we are defined as an "elite advisor group". Our Account Executives are well versed in navigating both the plan administrator portal and employee website experience. This can provide Whiting Door & your employees with a quick resolution and support. LRA is also very familiar with the education resources Principal provides, maximizing the tools and resources offered.

a. **What relevant issues should we be aware of/focused on?**

N/A

6. What plan design change initiatives have you led with your clients in the past 24 months?

All of our recommendations are driven from engagement and direction of the plan committee's goals and objectives. The most impactful recent changes include:

- Adding auto enrollment and auto increase
- Maximizing contribution for key executives
- Structuring company matches around participant outcomes
- Add ROTH deferral options
- Changes to eligibility and entry dates

INFORMATION REQUEST 6: FIDUCIARY STATUS AND COMPLIANCE

1. Do you intend to act as a fiduciary for the plan and/or its participants? To the extent you anticipate providing services that do not constitute fiduciary services, please expressly identify those exceptions.

Lawley Retirement Advisors, LLC (LRA) will provide either ERISA 3(21) or ERISA 3(38) fiduciary services for all plans with which we consult, both to the Plan Sponsor as well as to the plan's participants. Our mission is aligned with achieving successful outcomes for the plan sponsor and participants.

In some instances, group or enrollment education meetings conducted by account executives will be provided without incurring fiduciary status.

2 . What compliance resources does your firm provide?

Acting as an administrator and Committee member to an employer sponsored comes with great fiduciary responsibility. LRA goes to great lengths to guidance, support and resources to our clients.

<u>Fiduciary Briefcase:</u> We provide access to an online Fiduciary Briefcase for electronic and secure storage portal of all Plan related documents. The Fiduciary Briefcase is a online portal designed to be your private filing system, housing meeting minutes, compliance documents, newsletters and so much more, the Fiduciary Briefcase gives your committee anytime access to pertinent plan information and readily prepares your plan for audit.

<u>Ongoing Communication:</u> LRA sends our monthly newsletter, *Retirement Times* and quarterly fiduciary updates in our *Fiduciary Hot Topics* newsletter to all clients. LRA also hosts a semi-annual Retirement Roundtable that brings together 30 plan sponsor clients to discuss best practices and the latest industry news.

Plan Review Meetings: structured meetings documented with agenda items and meeting minutes.

Stewardship report: LRA will track all projects, tasks, RFP's and employee education. This represents an ongoing historical summary of plan related activity and the associated outcome.

Fiduciary Fitness Training: See response below in question 3.

Compliance Checklist: LRA will track and continuously update a compliance checklist in order to ensure specific responsibilities and expectations are being met.

Exhibit 11 – Fiduciary Briefcase Flyer

Exhibit 12 – Retirement Times and Fiduciary Hot Topics Newsletters

Exhibit 13 – Fiduciary Fitness Training Program

Exhibit 14 – Compliance Checklist

3. Do you offer committee training, education, and support?

LRA provides access to regular Committee training initiatives including webinars, our semi-annual Retirement Roundtable events, and continuous updates of legislative items impacting qualified retirement plans.

Our team can conduct Fiduciary Fitness Training for the Committee that consists of 21 education modules regarding various operational and compliance topics, for example, prohibited transactions, target date fund suitability and compliance with 404(c). This training is encouraged by LRA, but at the discretion of the Committee.

4. Describe your fiduciary responsibility under ERISA to our plan, including your ability to serve in an ERISA 3(21) or 3(38) capacity.

Our firm has the capability to act as an ERISA 3(21) or 3(38) co-fiduciary for all plans with which we consult, both to the plan as well as to the plan's participants. Our primary responsibilities include construction and recommended update to the IPS, fund menu due diligence, investment selection and ongoing monitoring.

5. Describe your fiduciary responsibility to our plan participants.

Enhancing participant outcomes is a core component of the work we do at LRA. Our focus driving engagement by being a resource to participants to help them reach their individual financial goals. Our responsibilities include assisting employees with determining appropriate risk tolerance and providing advice on a suitable account allocation that best fits their needs. This is accomplished when participants reach out to us individually or via private one-on-one meetings conducted onsite.

6. Describe potential conflicts of interest that may arise with the proposed advisory relationship.

LRA is an independent Registered Investment Advisor (RIA) and any recommendation made to the plan sponsor, committee members and plan participants is first and foremost in their best interest.

7. Does your firm have a written policy for addressing conflict of interest?

a. Please describe.

Yes, please refer to Section A, Item 7, Financial Industry Affiliations of ADV.

8. **Have any of your clients been the subject of an investigation by the Department of Labor?**

To the best of our knowledge, no clients have been or are under investigation from the Department of Labor.

a. **Please describe.**

N/A

INFORMATION REQUEST 7: FEES

1. How is your firm compensated for services?

LRA is compensated through either a flat advisory fee or percentage of plan assets. Those payments can either be billed directly to company or deducted from plan assets.

2. **What percentage of your firm's revenue is derived from:**

a. Commission relationships?

10% of business is commission-based compensation.

b. Advisory relationships?

90% of business is advisory based compensation.

3. **Does your firm receive any form of compensation or benefits from companies or individuals whose products or services you may refer or recommend? Do you sell research or provide conferences for investment managers?**

a. **Please explain.**

Lawley, LLC has multiple branches that offer different lines of business. Given our ability to service clients' needs across a variety of solutions, compensation may be paid to producers when introducing/growing existing business relationships. LRA does not provide research or conferences for investment managers.

4. **Please describe any and all fees for services to our plan under this proposal, and indicate any differences in pricing between a §3(21) arrangement and a §3(38) arrangement. In both cases, please indicate all services you propose to provide and their associated fees, the direct fees to be paid by the Company or the plans, and any compensation you anticipate receiving from sources other than the Company and the plans. Be sure to identify services which would involve a separate fee. The stated fee schedule must reflect the full amount of compensation to be paid to your firm or its affiliates that will be generated by or in connection with services to the plans.**

Exhibit 15 - Statement of Services including proposed advisory fee

5. **What expenses would you expect to have reimbursed?**

N/A – LRA does not expect expenses to be reimbursed.

6. **Does your firm accept soft dollars as a method of payment for services provided?**

b. **If so, how do you prevent conflicts of interest? Please list the**

advantages and disadvantages you see in the use of soft dollars.

N/A – Our firm does not accept soft dollar transactions.

7. **Are you willing to guarantee your fees for a specific period of time?**

Our fee is guaranteed for 3 years and is reviewed annually with the committee

8. **Does your firm provide written agreement or a letter of engagement detailing services provided to our plan?**

Yes

a. **If so, please include sample.**

Exhibit 16 –Lawley Retirement Advisors Client Agreement

9. **What is your ability to offset fees with 12b1 fees, finders' fees, or other fees embedded within the plans' investments?**

Fees may be offset based on structure of the plan, allowing LRA to redistribute any revenue-sharing arrangements within plan investments. Further conversations on structure can be discussed if LRA is selected as plan advisor.

10. **What are the termination costs, if any?**

LRA does not impose termination fees.

11. **Please indicate if a recordkeeper RFP is included in the fee proposal and any critical parameters associated therewith.**

We do not anticipate recommending a change immediately. Recordkeeper RFP's are conducted based on conversations with the Committee and are based off information LRA is not privy to at this time.

INFORMATION REQUEST 8: TECHNOLOGY

1. **Describe any technology used by your firm (excluding Principal Financial's website)**

LRA uses third party software for conducting investment analysis, fee benchmarking, measuring plan efficiency. Software usage include:

Investments	Plan Sponsor	Plan Participants
• Fi360 • RPAG Fiduciary Investment Review • Morningstar • Target Date Fund Analyzer • Stable Value Fund Analyzer	• Fiduciary Decisions Fee benchmarking • RPAG RFP Inquiry & Reporting • Fiduciary Briefcase • PlanVisualizer	• Education Hub • Recorded Articulates • WellCents • Edukate

b. **Which of this technology is proprietary or internally developed?**

None of the software we utilize is proprietary

c. **If purchased from another source, please provide the source of the technology and describe your ability to monitor and/or control the contents and any alternative resources if the technology was no longer available to you.**

N/A

2. **What applications do you run that would be beneficial to our plan?**

All software mentioned in question 1 above is beneficial to the plan. Software usage is determined by plan needs.

a. **Which of these applications are proprietary or internally developed?**

None of the software we utilize is proprietary

INFORMATION REQUEST 9: SECURITY AND BUSINESS CONTINUITY

1. **Please describe the succession plan for the primary contact who will be working with our plan**

LRA's current structure has one founder, one managing director and three investment advisors. This plan has multiple advisors assigned so if James Rehak Jr. was to retire, Laura Cooley or JP Rehak would step into the lead advisor role. LRA has built an operational process that is adhered to by all team members to ensure the expectation of clients and commitment of services can be delivered without fail.

2. Please describe the succession plan of your firm

Current management has positioned our organization to grow and evolve with our clients. Our current advisor group is diverse in age allowing us to deliver fiduciary services for years to come.

3. Please describe your firm's cybersecurity/data security measures

Below is a review of our quality controls that we have in place at our firm. In this age of data protection and cyber security it is more important than ever plan sponsors understand the protocols their provider partners have in place to protect this information.

Our advisors and account executives regularly receive calls from participants and employees. We strive to ask for two forms of identification before sharing any account related information.

LRA utilizes a secure file share portal to send and receive documents that have personally identifiable information for both the employer and employees.

Lawley uses the following technology to secure its environment:

- Routers with configured firewalls and current code
- SFTP Server (Secure File Transport Protocol)
- User accounts and folder/file permissions are managed in Microsoft Active Directory
- VPN (Virtual Private Network) connections
- TLS (Transport Layer Security)
- ZIX Encrypted Email

- Secure Remote File Access (Citrix)

4. **Please describe your firm's disaster recovery plans**

LRA maintains a business continuity plan. The procedure is reviewed annually by all members of the team. Lawley has gone to great lengths to ensure there would be little disruption to business operations.

INFORMATION REQUEST 10: AVAILABILITY

1. **Please indicate your willingness to attend Committee meetings in person, the frequency with which you are willing to attend, and your expectations regarding reimbursement of associated expenses.**

LRA plan advisors and account executive will attend every Committee meeting in-person (unless expressed otherwise by the Committee). Semi-annual plan reviews. No reimbursement of associated expenses.

2. **Please indicate your willingness to review investment-related Committee materials prepared by the Company's staff and/or counsel in preparation for Committee meetings or for circulation to the Committee between meetings.**

As a co-fiduciary of Whiting Door Manufacturing Corp retirement plans, LRA is very willing to review input or material provided by the Company and/or Counsel prior to or in between meetings.

3. **Please indicate your willingness to provide advance copies of Committee materials to Committee members for review, and your willingness to make edits accordingly (subject in all cases to your professional judgment).**

Committee members will receive plan review material 72 hours prior to scheduled meeting. If any additional agenda items are requested by the Committee, they will be addressed and added promptly.

4. **Please indicate your availability to discuss developments and questions related to the Plans' investments between Committee meetings.**

Our advisor team is always available to discuss the markets, economy or fund performance in-between scheduled meetings. In times of heightened market volatility, we see higer than normal outreach from plan sponsors and participants.

5. **If you have indicated that you offer participant communication services, please indicate your willingness to facilitate in-person group and/or individual meetings with participants, as well as your availability for telephone, online or other long- distance interaction.**

Ensuring participant success is our top priority to LRA clients. We offer in-person education meetings in both group and individual settings, based on the preference of the Committee.

Our advisor and service team are willing to assist with questions from plan members. Email, telephone, and online interaction will receive a timely response from one of our LRA team representatives.