

MEMORANDUM

Subj: First Command Educational Foundation – Volunteer Opportunities and Ground Rules
Date: January 19, 2016

1. Purpose

This Memorandum is jointly issued by First Command Educational Foundation (“Foundation”) and First Command Financial Services, Inc. and its subsidiaries (together “First Command”) to provide guidance to First Command Financial Advisors (“Advisors”) regarding volunteer opportunities with the Foundation.

2. Background

The Foundation began as a First Command private foundation. However, it was subsequently incorporated as a separate organization and was approved by the IRS as an incorporated independent public charity. It is independent of First Command and its subsidiaries to include having its own Board of Directors. The Foundation is an approved 501(c)(3) organization under the Internal Revenue Code and donations to the Foundation qualify as tax exempt to the extent allowed by law. It is important to maintain separation between First Command’s corporate business and the Foundation’s charitable non-profit activities. This distinction maintains the Foundation’s tax-exempt status that underpins the many charitable works the Foundation conducts on behalf of our military service personnel and their families.

3. The Foundation’s Mission is to “Educate Those Who Serve”

First Command, many Advisors, and employees have a long history of making generous voluntary contributions of money, time, facilities, and equipment to the Foundation. There continue to be many volunteer opportunities.

4. Opportunities for Advisors

There are many current needs for volunteers to include providing Foundation educational programs in the form of presentations, workshops, seminars, and conferences. In all cases the Foundation will prepare the appropriate materials, provide them to the volunteer, and cover appropriate expenses directly related to the educational opportunity. In addition, the Foundation often needs Advisors to represent it at scholarship award ceremonies.

5. Ground Rules for Volunteer Activities with the Foundation

a. First Command Approval of Presentation, Workshop, Seminar, and Conference Materials Used by Advisors

First Command will work with the Foundation to preapprove certain Foundation presentations, workshops, seminars, or conference materials for use by its Advisors. Such materials will be identified by the Foundation by name, effective date, and control number. First Command and the Foundation will each maintain a current listing of all such preapproved materials. In the event the Foundation changes any such materials, it will notify First Command in advance to afford it the opportunity to either preapprove the changes or require that the materials be removed from the preapproved list.

An Advisor who volunteers to deliver a Foundation presentation, workshop, seminar, or conference must, no later than the day of the event, notify First Command’s Compliance Department of the date and location of the event, a brief description of the intended audience, and the name, effective date and control number of the materials. (Advisors may send this

notification via e-mail to the First Command Legal and Compliance Inbox.) Advisors will not obtain or keep a list of the attendees at an event. Advisors may not alter or otherwise change any preapproved materials to be used at an event.

b. Volunteer Activities are for the Foundation

Advisors and employees represent the Foundation while participating in Foundation activities. During volunteer activities, Advisors may not engage in selling or solicitation activities on behalf of First Command.

c. Foundation Activities in the Home Office

There are no limitations on participating in Foundation activities in the Home Office.

d. Foundation Activities Not on DoD Military Installations

Advisors may participate in Foundation activities or otherwise volunteer to assist the Foundation with financial presentations, seminars, and other activities at public or private schools, hotels, First Command Advisor Offices, and other locations not on DoD military installations. The Foundation requires Advisors to sign a volunteer agreement with the Foundation and agree to abide by any restrictions placed on them by this agreement. As required above, Advisors must only use Foundation presentation, workshop, seminar, or conference materials that are preapproved by First Command, and they must report the details of the event to First Command's Compliance Department no later than the day of the event.

e. Foundation Activities on DoD Military Installations

The Foundation may conduct educational presentations on DoD military installations with the approval of the applicable Military Department and installation commander. However, DoD regulations impose the following limits on the Foundation's on-installation presentations, including a specific prohibition on the use of financial advisors and insurance agents in the programs:

- (1) Advisors may not conduct educational presentations on behalf of the Foundation. DoDI 1344.07, para. 6.7, prohibits commercial agents, including representatives of loan, finance, insurance, or investment companies, from making on-installation presentations to members of the Military Services on personal financial affairs including such subjects as insurance, savings, and budgeting.
- (2) The Foundation may not recommend First Command for financial services during educational presentations for members of the Military Services. However, should a participant specifically request the name of a firm that can further assist with financial services, the Foundation may give the participant First Command's contact information.
- (3) The Foundation must disclose that neither the Foundation nor DoD endorse or favor any commercial supplier, product or service, or promote the services of a specific financial institution.
- (4) Advisors may sit in on the Foundation's education presentations *if* (a) Advisors clear their attendance with the installation in advance, (b) Advisors do not conduct solicitation activities while present, and (c) the Foundation does not endorse the Advisors. Installations will likely insist that Advisors not attend; however, a few installations may be willing to allow it.

(5) The Foundation may not request contact information from attendees for purposes of sharing it with First Command or any of its subsidiaries.

6. Advisor Use of Foundation Materials

Foundation materials provided to Advisors may only be used for the specific presentation for which they are provided. Any other use must be approved by the Foundation. The materials are for educational purposes and are not intended as financial advice. Reproduction or transmittal of the materials requires prior written permission of the Foundation. Foundation contact information is at the end of this memo.

7. Volunteer Contact.

Advisors or employees interested in volunteering to assist the Foundation can contact Bill Johnson, the Foundation's Director, Military Affairs, at (817) 569-2500 or wmjohnson@fcf.com, or Vickie Coleman, the CEO, at (817) 569-2260 or vlcoleman@fcf.com.

8. Questions.

Legal & Compliance - Mike Neveu (817) 569-2336 or mbneveu@firstcommand.com, or Murtaza Sardharwala (817) 569-2336 or masardharw@firstcommand.com.