



**Guidance**

**Operational Process**

**Purchase of BHC/Bank Stock**

Stock purchases to be handled by bank stock transfer desk (responsible staff). Transfer desk to facilitate the BUY/SELL fulfilment side of the SDIRA.

Process:

Bank operations to review on an account by account basis on a to be determined schedule (recommended quarterly) the cash level within each respective SDIRA. Based on availability of cash, operations to inform Transfer Desk of total cash available and individual account levels. (Bank to pre-determine minimum number of shares required for purchasing (range 1-?) and inform Transfer Desk)

Based on availability of shares Transfer Agent will on an account by account basis inform operations of cash withdrawals needed to effect purchases. All purchases to be made in ‘whole shares only’ no fractional shares. Remaining cash to remain in the account holders cash savings (tied to SDIRA). Transfer agent to provide operations ‘purchase settlement’. Transfer agent to provide account holder printed ledger statement noting shares purchased with form letter.

Dependent on program structure account holder may elect to have all available cash continually presented for purchase of shares. Another election is that on sufficient cash balance account holder would be contacted for authorization of purchasing of additional shares.

Transfer Agent will direct shares for titling as SDIRA purchase held by bank. (Certificate or book entry)

**Availability of shares:**

Purchasing of shares for the SDIRA program is dependent on availability of shares. Being privately held share availability is often intermittent and is dependent on a wide range of factors. If limited shares are available to support purchases, then the transfer agent will need to proportionately distribute shares. If no shares are available, then purchases would be deferred until such time that shares do become available. (Management direction needed to manage sells in low availability scenarios.)