



**Guidance**

**For SDIRA Program Operating Benchmarks**

**Common Stock:**

Common stock is typically purchased for the benefit of a SDIRA from two primary sources:

* Purchased directly from the street
* Purchased through an Offering Circular (raising capital)

Common stock would be purchased only in ‘whole shares’ no fractional

**Setting of Purchase Price:**

The Board of Directors of BHC/Bank need to make determination that common stock purchases (street) would be based on the most recently performed third party stock valuation of the company/bank.

* Company/Bank would notify stock transfer agent on FMV pricing
* Dependent on stock liquidity (availability of stock purchases for the benefit of a SDIRA would be distributed as evenly as possible between account holders.
* Secondary offerings: Common stock purchases would be based on the offering price and subject to the guidance, as detailed within the circular.

**Frequency:**

* Recommendation for end of quarter purchases for existing SDIRAs based on availability of funds
* New SDIRAs as new accounts or transfers (internal-external) would look to purchase available shares at time of opening.
* Operations to review cash positions quarterly and either make direct purchases or seek guidance from account holder on purchaser’s intent.

**Distribution:**

* Community bank stock is inherently ill-liquid and depending on institution may have periods of availability of stock versus periods of extremely limited availability.
* For periods of limited availability, it is recommended that shares be evenly spread across all buyers.