



**Ingham Retirement Group
Miami, Florida**

**SYSTEM AND ORGANIZATION CONTROLS (SOC) 1 TYPE 2
REPORT**

**REPORT ON INGHAM RETIREMENT GROUP'S DESCRIPTION
OF ITS DEFINED CONTRIBUTION RETIREMENT PLAN
ADMINISTRATION SYSTEM AND ON THE SUITABILITY OF THE
DESIGN AND OPERATING EFFECTIVENESS OF ITS CONTROLS**

**THROUGHOUT THE PERIOD
JANUARY 1, 2019 TO DECEMBER 31, 2019**

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I. INDEPENDENT SERVICE AUDITOR'S REPORT



Independent Service Auditor's Report

To Management of Ingham Retirement Group:

Scope

We have examined Ingham Retirement Group's ("Ingham," the "Company," or the "service organization") description of its defined contribution retirement plan administration system entitled "Description of Ingham's Defined Contribution Retirement Plan Administration System" for processing user entities' transactions throughout the period January 1, 2019 to December 31, 2019 (description), and the suitability of the design and operating effectiveness of controls included in the description to achieve the related control objectives stated in the description based on the criteria identified in "Assertion of Ingham Retirement Group Management" (assertion). The controls and control objectives included in the description are those that management of Ingham believes are likely to be relevant to user entities' internal control over financial reporting, and the description does not include those aspects of the defined contribution retirement plan administration system that are not likely to be relevant to user entities' internal control over financial reporting.

The information in Section V, "Other Information Provided by the Service Organization," is presented by management of Ingham to provide additional information and is not a part of Ingham's description of its defined contribution retirement plan administration system made available to user entities during the period January 1, 2019 to December 31, 2019. Information about Ingham's disaster recovery and continuity planning has not been subjected to the procedures applied in the examination of the description of the defined contribution retirement plan administration system made available to user entities and of the suitability of the design and operating effectiveness of controls to achieve the related control objectives stated in the description of the defined contribution retirement plan administration system and, accordingly, we express no opinion on it.

Ingham uses Fidelity National Information Service, Inc. (FIS), a subservice organization, to provide development and support of the Relius Administration System (Relius), the Relius web interface application; ColoHouse, a subservice organization, to provide colocation facility services; and beginning on April 27, 2019, SECNAP Network Security (SECNAP), a subservice organization, to provide network monitoring services. The description includes only the control objectives and related controls of Ingham and excludes the control objectives and related controls of the subservice organizations. The description also indicates that certain control objectives specified by Ingham can be achieved only if complementary subservice organization controls assumed in the design of Ingham's controls are suitably designed and operating effectively, along with the related controls at the service organization. Our examination did not extend to controls of the subservice organizations and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Ingham's controls are suitably designed and operating effectively, along with related controls at the service



organization. Our examination did not extend to such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

Service Organization's Responsibilities

In Section II, Ingham has provided an assertion about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description. Ingham is responsible for preparing the description and its assertion, including the completeness, accuracy, and method of presentation of the description and the assertion, providing the services covered by the description, specifying the control objectives and stating them in the description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria stated in the assertion, and designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the description.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether, in all material respects, based on the criteria in management's assertion, the description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the description throughout the period January 1, 2019 to December 31, 2019. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of controls involves:

- performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on the criteria in management's assertion.
- assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the description.
- testing the operating effectiveness of those controls that management considers necessary to provide reasonable assurance that the related control objectives stated in the description were achieved.
- evaluating the overall presentation of the description, suitability of the control objectives stated therein, and suitability of the criteria specified by the service organization in its assertion.



Inherent Limitations

The description is prepared to meet the common needs of a broad range of user entities and their auditors who audit and report on user entities' financial statements and may not; therefore, include every aspect of the system that each individual user entity may consider important in its own particular environment. Because of their nature, controls at a service organization may not prevent, or detect and correct, all misstatements in processing or reporting transactions. Also, the projection to the future of any evaluation of the fairness of the presentation of the description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives, is subject to the risk that controls at a service organization may become ineffective.

Description of Tests of Controls

The specific controls tested and the nature, timing, and results of those tests are listed in Section IV.

Emphasis of Matter

As described in Section III, after the period covered by the examination, the World Health Organization classified the COVID-19 outbreak as a pandemic in March 2020. Based on the rapid increase in exposure globally, the gravity or length of the impact of the COVID-19 outbreak cannot be estimated at this time.

Opinion

In our opinion, in all material respects, based on the criteria described in Ingham's assertion:

- a. the description fairly presents the defined contribution retirement plan administration system that was designed and implemented throughout the period January 1, 2019 to December 31, 2019.
- b. the controls related to the control objectives stated in the description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the period January 1, 2019 to December 31, 2019, and the subservice organizations and user entities applied the complementary controls assumed in the design of the service organization's controls throughout the period January 1, 2019 to December 31, 2019.
- c. the controls operated effectively to provide reasonable assurance that the control objectives stated in the description were achieved throughout the period January 1, 2019 to December 31, 2019, if complementary subservice organization and user entity controls assumed in the design of the service organization's controls operated effectively throughout the period January 1, 2019 to December 31, 2019.

Restricted Use

This report, including the description of tests of controls and results thereof in Section IV, is intended solely for the information and use of Ingham, user entities of Ingham's defined



contribution retirement plan administration system during some or all of the period January 1, 2019 to December 31, 2019, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information, including information about controls implemented by user entities themselves, when assessing the risks of material misstatements of user entities' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.

BDO USA, LLP

April 9, 2020

**II. ASSERTION OF INGHAM RETIREMENT GROUP
MANAGEMENT**

Assertion of Ingham Retirement Group Management

We have prepared the description of Ingham Retirement Group's ("Ingham," the "Company," or the "service organization") defined contribution retirement plan administration system entitled "Description of Ingham's Defined Contribution Retirement Plan Administration System" for processing user entities' transactions throughout the period January 1, 2019 to December 31, 2019, (description) for user entities of the system during some or all of the period January 1, 2019 to December 31, 2019, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information, including information about controls implemented by the subservice organizations and user entities of the system themselves, when assessing the risks of material misstatements of user entities' financial statements.

Ingham uses Fidelity National Information Service, Inc. (FIS), a subservice organization, to provide development and support of the Relius Administration System (Relius), the Relius web interface application; ColoHouse, a subservice organization, to provide colocation facility services; and beginning on April 27, 2019, SECNAP Network Security (SECNAP), a subservice organization, to provide network monitoring services. The description includes only the control objectives and related controls of Ingham and excludes the control objectives and related controls of the subservice organizations. The description indicates that certain control objectives specified by Ingham can be achieved only if complementary subservice organization controls assumed in the design of Ingham's controls are suitably designed and operating effectively, along with the related controls at the service organization. The description does not extend to controls of the subservice organizations.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Ingham's controls are suitably designed and operating effectively, along with related controls at the service organization. The description does not extend to controls of the user entities.

We confirm, to the best of our knowledge and belief, that:

- a. the description fairly presents the defined contribution retirement plan administration system made available to user entities of the system during some or all of the period January 1, 2019 to December 31, 2019 for processing their transactions as it relates to controls that are likely to be relevant to user entities' internal control over financial reporting. The criteria we used in making this assertion were that the description:
 - i. presents how the system made available to user entities of the system was designed and implemented to process relevant user entity transactions, including, if applicable:
 1. the types of services provided including, as appropriate, the classes of transactions processed.
 2. the procedures, within both automated and manual systems, by which those services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to reports and other information prepared for user entities of the system.

3. the information used in the performance of the procedures, including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions; this includes the correction of incorrect information and how information is transferred to the reports and other information prepared for user entities.
 4. how the system captures and addresses significant events and conditions, other than transactions.
 5. the process used to prepare reports and other information for user entities.
 6. services performed by subservice organizations, if any, including whether the inclusive method or the carve-out method has been used in relation to them.
 7. the specified control objectives and controls designed to achieve those objectives, including, as applicable, complementary user entity controls and complementary subservice organization controls assumed in the design of the service organization's controls.
 8. other aspects of our control environment, risk assessment process, information and communications (including related business processes), control activities, and monitoring activities that are relevant to the services provided.
- ii. includes relevant details of changes to the service organization's system during the period covered by the description.
 - iii. does not omit or distort information relevant to the service organization's system, while acknowledging that the description is prepared to meet the common needs of a broad range of user entities of the system and their user auditors, and may not, therefore, include every aspect of the defined contribution retirement plan administration system that each individual user entity of the system and its auditor may consider important in its own particular environment.
- b. the controls related to the control objectives stated in the description were suitably designed and operating effectively throughout the period January 1, 2019 to December 31, 2019, to achieve those control objectives if subservice organizations and user entities applied the complementary controls assumed in the design of Ingham's controls throughout the period January 1, 2019 to December 31, 2019. The criteria we used in making this assertion were that:
1. the risks that threaten the achievement of the control objectives stated in the description have been identified by management of the service organization.
 2. the controls identified in the description would, if operating effectively, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved.
 3. the controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority.

**III. DESCRIPTION OF INGHAM RETIREMENT GROUP'S DEFINED
CONTRIBUTION RETIREMENT PLAN ADMINISTRATION
SYSTEM**

Description of Ingham Retirement Group's Defined Contribution Retirement Plan Administration System

Overview

This is a System and Organization Controls ("SOC") 1 Type 2 report on Ingham Retirement Group's ("Ingham," the "Company," or the "service organization") defined contribution retirement plan administration system for processing user entities' transactions throughout the period January 1, 2019 to December 31, 2019, which may be relevant to the internal control over financial reporting of user entities. The description has been prepared in accordance with the guidance contained in the American Institute of Certified Public Accountants' Statement on Standards for Attestation Engagements (SSAE) No. 18, specifically AT-C Section 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities Internal Control Over Financial Reporting*.

Ingham/Russell Investment Advisors Inc. and Ingham Financial Corporation, doing business as Ingham Retirement Group (Ingham), are wholly owned subsidiaries of Ingham & Company. Ingham's combined staff of professionals provides plan design, installation, and administration services. The combined staff also includes an ERISA attorney, a CPA, and actuaries.

Services

Ingham is an employee benefit consulting firm providing consulting and administrative services using daily valuation. As an independent investment advisor, Ingham Retirement Group leverages relationships with multiple account custodians to provide user entities with access to a universe of investment products including mutual funds, exchange-traded funds, securities, and managed accounts. Institutions such as Fidelity Institutional Brokerage Group, Charles Schwab & Co, American Funds, and Frank Russell Investment Management Company allow Ingham to offer a vast array of investment products based on the user entities' goals and objectives. Administrative and consulting services include: plan and participant recordkeeping, preparation of IRS Form 5500s, nondiscrimination testing, prototype plan documents, participant statements, plan reporting, bilingual (English and Spanish) Call Center, and website. This report only covers the qualified daily valuation defined contribution plan administration services provided by Ingham.

Scope

This description only addresses Ingham's defined contribution retirement plan administration system provided to user entities and excludes other services provided by Ingham. The description is intended to provide information for user entities of the defined contribution retirement plan administration system and their independent auditors who audit and report on such user entities' financial statements, and is intended to be used in obtaining an understanding of the defined contribution retirement plan administration system and the controls over that system that are likely to be relevant to user entities' internal control over financial reporting.

The description of the system includes certain business process controls and information technology general controls that support the delivery of Ingham's defined contribution retirement plan administration system. The description does not encompass all aspects of the services provided or procedures followed for activities performed at Ingham that are not related to internal control over financial reporting. The description was designed to cover standard controls followed by Ingham for its defined contribution retirement administration system. Unique processes or control situations are outside the scope of this description. The description does not encompass all aspects of the services

provided or procedures followed that are not related to internal control over financial reporting activities performed at Ingham.

Ingham uses FIS, a subservice organization, to provide development and support of Relius, the Relius web interface application; ColoHouse, a subservice organization, to provide colocation facility services; and beginning on April 27, 2019, SECNAP, a subservice organization, to provide network monitoring services. The description includes only the control objectives and related controls of Ingham and excludes the control objectives and related controls of the subservice organizations.

Impact of COVID-19

The World Health Organization classified the COVID-19 outbreak as a pandemic in March 2020. Based on the rapid increase in exposure globally USICG (the service organization) cannot estimate the gravity or length of the impact of the COVID-19 outbreak at this time. Ingham was fully operational and did not experience any downtime due to COVID-19.

Internal Control Framework

This section provides information about the five interrelated components of internal controls at Ingham, including:

- Control Environment,
- Risk Assessment Process,
- Monitoring Activities,
- Information and Communications, and
- Control Activities.

Control Environment

Personnel Policies and Procedures

Ingham requires all potential candidates to submit an employment application that includes professional experience, education, and professional references. Background investigations are performed on applicants who are being considered for employment that include county, federal, and state criminal checks as well as credit history checks.

An Employee Handbook is provided to new employees that include policies on open door communications and harassment, warnings and discipline, conduct at work, evaluations, professional organizations, and education. New employees are required to sign an acknowledgement that they have read the Employee Handbook.

Information Technology Policies and Procedures

New employees are provided with the Software Usage Agreement that includes policies on non-disclosure and computer hardware, software and security. In addition, employees are provided with a Computer and Internet policy, the Information Security Policy, and an Email policy. New employees are required to sign the Software Usage Agreement, the Computer and Internet and Email Policies.

Policy for Training

Employee training consists principally of on-the-job training and external training. In addition, Ingham provides reimbursement for industry related professional memberships, tuition, course material, and examination fees. Ingham personnel attend training classes offered by the American Society of Pension Professional and Actuaries (ASPPA) and FIS, on the Relius Administration System. New employees are required to undergo cybersecurity training during the first two weeks of employment. A “new employee” training catalog has been established that contains a variety of cybersecurity related online courses dealing with topics like:

- Password security
- Internet browsing
- Phishing attempts
- PII security
- Cyber security fundamentals
- Email security
- Mobile device security
- Ransomware

Additionally, all employees are mandated to complete annual cybersecurity training courses.

This annual training mandate is reinforced throughout the year with campaigns at least once a month. The campaigns are closely monitored and the results are logged. Failures, if any, are brought to the attention of the employee and his/her supervisor. A summary report is produced for Executive Management for overall oversight and training reinforcement. Additionally, the “email phishing” results are published in the Company newsletter “The Plan”.

Organization Structure

Ingham is organized into teams that support the administration of qualified daily valuation defined contribution retirement plans as follows:

- Client Services - Responsible for quarterly reporting, participant statements, and for day-to-day contact with user entities
- Operations - Responsible for contribution and loan repayment processing, distribution and loan processing, reconciliation, dividend posting, transfer/exchange processing
- Administration - Responsible for preparation of nondiscrimination testing and Form 5500s
- Information Technology - Responsible for information system support

The teams are managed by supervisors who report to their respective department head. In addition, each user entity is assigned a consultant who is responsible for overseeing the relationship and reports to the President and Chief Executive Officer (CEO).

Risk Assessment Process

Ingham has a risk assessment process to identify and manage risks that could affect its ability to provide administration of qualified daily valuation defined contribution retirement plans for user

entities. The risk assessment process includes an assessment by a third party to obtain the Centre for Fiduciary Excellence (CEFEX) certification and monthly management meetings that include a discussion of overall risks. For any significant risks identified, management implements appropriate measures to monitor and manage those risks.

Monitoring Activities

Ingham management and supervisory personnel monitor the quality of the internal control environment via frequent observance, interaction, and reviews of selected transaction processing checklists and supporting documentation. Any deficiencies noted from ongoing monitoring of processes and procedures are communicated to the relevant personnel.

Monitoring of the Subservice Organizations

Ingham receives the SOC 1 Type 2 reports from FIS, ColoHouse, and SECNAP on an annual basis. In addition, through its daily operational activities, management of Ingham monitors the services performed by its subservice organizations to ensure that operations and controls expected to be implemented at the subservice organizations are functioning effectively. Management also holds periodic calls with the subservice organizations to relay any issues or concerns.

Information and Communication

Ingham uses various methods of communication to help ensure employees understand their individual roles and responsibilities as they relate to the defined contribution retirement plan administration system for user entities and to help ensure that information is communicated on a timely basis. These methods include job descriptions, training, and operational meetings.

Ingham has implemented various methods of communication with its user entities to help ensure they understand their individual roles and responsibilities as they relate to the defined contribution retirement plan administration system provided by Ingham and to help ensure information is communicated on a timely basis. These methods include a service agreement that is required to be signed by the user entity and telephone and email communications.

Description of Computerized Information Systems

Ingham Network

Ingham's technological infrastructure consists of a Wide Area Network (WAN) spread geographically across Miami (Main corporate office) and at ColoHouse, located in Downtown Miami, Florida. This network is used by Company employees for Internet and email access, file and print sharing, application processing, and general information. The servers are configured with appropriate hard drive storage, memory capacity and processing speed that are used for network authentication, file and print services, and for Relius Administration System processing. Workstations throughout the organization connect to the network. The network uses Windows servers to provide controlled and monitored access to the Company's data.

Relius Administration System (Relius)

Ingham performs plan and participant recordkeeping using Relius, a recordkeeping application developed and maintained by FIS, located in Jacksonville, Florida.

Ingham employees access Relius directly through application processing servers that are located in ColoHouse.

Each business day, plan and participant transactions are processed in Relius. Plan and participant account balances are updated based on the transactions processed and the closing prices received from custodians. Relius is also used to generate plan level reports and participant statements detailing plan and participant transaction activity and balances.

Data Validation Center (DVC), which is an online program in Relius that allows plan sponsors to directly upload electronic files to Ingham.

Web Server and Websites

The Relius web interface application is an interactive system that is developed and maintained by FIS. The Relius web interface application runs on a server using the Windows 2012 R2 Standard operating system.

The Corporate portal (<https://www.ingham.com>) and Relius website (<https://accounts.ingham.com>) can be accessed via a personal computer over the Internet. Participants may perform any of the following functions via the website:

- Transfers and investment election changes,
- Model or request loans, as applicable, or
- View balances, transactions, and details relating to their account.

Control Activities

The service organization has developed a variety of policies and procedures including related control activities to help ensure the service organization's objectives are carried out and risks are mitigated. These control activities help ensure that services are administered in accordance with the service organization's policies and procedures.

Control activities are performed at a variety of levels throughout the organization and at various stages during the relevant business process. Controls may be preventive or detective in nature and may encompass a range of manual and automated controls, including authorizations, reconciliation, and IT controls. Duties and responsibilities are allocated among personnel to ensure that a proper segregation of duties is maintained.

Ingham has specified the control objectives and identified the controls that are designed to achieve the related control objectives.

Numerical cross-references are used to reference controls in Section III to the related control and testing in Section IV.

Control Objective 1 - New/Conversion Plan Setup

Controls provide reasonable assurance that new/conversion plan specifications, account balances, and investment elections are recorded in Relius in an accurate, complete and timely manner.

The plan specifications (e.g., loan terms, vesting schedule) are entered into Relius from the plan document. Once complete, the plan specifications in Relius are reviewed for accuracy and a member of the Administration Team electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor (1.1).

Participant census data (e.g., name, address, Social Security Number (SSN), date of hire, date of birth) is imported into Relius from electronic files received from the plan sponsor or obtained from an enrollment form.

Participant investment elections are imported into Relius: based on an electronic file received from the prior service provider; plan sponsor; manually from the enrollment form completed by the participant; or utilizing the default investment elections. A selection of participants' investment elections in the electronic file or each participant's investment elections received on an enrollment form, as applicable, are compared to Relius noting agreement. A member of the Administration Team, Client Services Team, or Operations Team electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor (1.2).

Conversion balances are imported into Relius based on an electronic file received from the prior service provider. The plan total and a selection of participant conversion balances in Relius are compared to the ending balances on the prior service provider statements noting agreement. A member of the Administration Team or the Operations Supervisor electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor (1.3).

Distributions, new loans, and loan repayments cannot be processed during the blackout period for conversion plans. The blackout period is the time necessary to reconcile the ending participant level balances from the prior service provider to the participant level beginning balances in Relius. The length of the blackout period is dependent on the availability of data from the prior service provider, but typically lasts approximately 10 to 45 days.

Vested percentages are calculated by Relius based upon the vesting schedule setup in Relius and the participant's years of service as calculated by Relius. If the vested percentage is not provided by the prior service provider, Ingham manually re-calculates the vested percentage based on the participant's date of hire and termination, if applicable, and the vesting schedule per the plan document. The vested percentage calculated by Relius is compared to the vested percentage on the prior service provider statements, if provided, or the vested percentage manually calculated by Ingham. Discrepancies are resolved with the plan sponsor. A member of the Administration Team electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor (1.4).

Control Objective 2 - Contribution and Loan Repayment Processing

Controls provide reasonable assurance that contributions and loan repayments are recorded in the plan within Relius in an accurate, complete, and timely manner.

Contribution and loan repayment information is received in an electronic file from the plan sponsor or may be submitted by the plan sponsor via direct upload to the DVC.

An Advice of Investment Remittance Statement detailing the total contributions by source and loan repayments is received from the plan sponsor or completed by Ingham for the information received from the plan sponsor for non-DVC or electronic file submissions. The total contributions and loan repayments on the Advice of Investment Remittance Statement or Import Census Report is compared to the cash received by the custodian in the Cash Receipt Report noting agreement. A member of the Operations Team electronically signs the workflow system to evidence the review performed (2.1). Discrepancies are resolved as necessary.

Contributions and Loan Repayment Information Received via the DVC

The plan sponsor must enter a user name and password to upload the electronic file detailing contribution and loan repayment information via the DVC (2.2). The plan sponsor has the ability to review the information uploaded via the DVC. The plan sponsor must submit the file for processing which creates a suspended transaction in Relius and automatically generates an Import Census Report detailing the total contributions by source and loan repayments processed in Relius.

Contribution and Loan Repayment Information Received in an Electronic File or via the DVC

Total contributions by source and loan repayments on the source totals are compared to the Advice of Investment Remittance Statement or Import Census Report noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed (2.3). Discrepancies are resolved as necessary. Once verified, the file is imported into Relius.

Contributions and loan repayments are processed in Relius which creates a suspended transaction and generates an Import Census Report detailing the total contributions by source and loan repayments processed in Relius.

Contribution and Loan Repayment Information Received in an Electronic File

The totals on the Import Census Report are compared to the Advice of Investment Remittance Statement noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed.

Contribution and Loan Repayment Information Received in an Electronic File or via the DVC

Relius compares all employees on the file to the master employee database and updates any new employee information as necessary. In addition, Relius performs edit checks on census data to identify potential errors (i.e., contributions received for participants who have not submitted investment elections); errors are resolved as appropriate.

Once verified, the contribution and loan repayments that were in a suspended status are posted in Relius which generates the trades and allocates the contributions and loan repayments to individual participant accounts. Once posted, a cash receipt ledger is generated from Relius detailing the total dollar amount to be purchased. The total on the trade details is compared to the Advice of Investment Remittance Statement or Import Census Report noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed (2.4).

Contributions and loan repayments are processed and trades are sent to the custodian to be executed within three business days of receipt of complete and accurate contribution and loan repayment information from the plan sponsor and notification of receipt of funds at the custodian. Ingham monitors

that contributions and loan repayments were processed, and trades were sent to the custodian within three business days of receipt of complete and accurate contribution and loan repayment information from the plan sponsor and notification of receipt of funds at the custodian. A member of the Operations Team electronically signs the workflow system to evidence the review performed (2.5).

Control Objective 3 - Distribution Processing

Controls provide reasonable assurance that distributions are: (1) approved by the plan sponsor, as applicable; (2) authorized by the participant or their beneficiary; (3) recorded in Relius in an accurate manner; and (4) processed in a timely manner.

Distributions are processed one of three methods. When using the first method, the plan sponsor must complete and sign a request for distribution form, except in the instances where the plan sponsor requests a distribution or when a mandatory distribution is required and forwards it to Ingham. Participants must complete and sign the distribution election form and return it to Ingham for processing.

When using the second method, participants obtain a distribution package from the plan sponsor or the form is downloaded from the participant website. The participant returns the completed form to the plan sponsor for their review and approval. The plan sponsor returns the distribution request form to Ingham.

When using the third method, participants utilize the website to request their distribution. Plan sponsors are notified via email that a request has been made that requires their authorization. The Plan Sponsor must log in and approve or deny the request.

The request for distribution form is reviewed to verify that the request has been signed by, requested, or approved by the plan sponsor. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (3.1). Once the distribution election forms are received, the forms are reviewed to verify that forms have been signed by the participant and spouse (as applicable), and for the second method, also signed by the plan sponsor. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (3.2). Once verified, the distribution is posted in Relius.

Vesting is calculated based upon the terms of the plan document and compared to the vesting calculated by Relius noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (3.3).

Once trades have been executed, a Distribution Statement is generated from Relius which details the distribution amount and the participant's account balance after liquidation of assets. The Distribution Statement and check instructions are reviewed to verify that the distribution was accurately deducted from the participant's account. A member of the Operations Team electronically signs the workflow system to evidence the review performed (3.4).

The payee, distribution amount, and tax withholding, as applicable, are compared to the distribution election form or Distribution Statement, as applicable, noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (3.5). A distribution report is available online for plan sponsors to determine the amount of the distribution. The report provides the date of distribution and amount.

For plans that have Reliance Trust Company (Reliance), Fidelity Directed Trustee Paying Agent (FDTPA), or Schwab Trust (Schwab) as the paying agent, the check instructions (e.g., payee, address, and amount) are exported from Relius into a file or are manually entered on a form. The check instructions on the file or on the form are compared to the distribution election form or Distribution Statement, as applicable, noting agreement.

A member of the Client Services Team electronically signs the workflow system to evidence the review performed. Once verified, the check instructions are sent to the paying agent.

Distributions are processed and check instructions are sent to the plan sponsor or the paying agent within eight business days of receipt of complete and accurate distribution forms and receipt of the participant's last contribution. Ingham monitors that distributions were processed and check instructions were sent to the plan sponsor or paying agent, as applicable, within eight business days after receipt of complete and accurate distribution forms and receipt of the participant's last contribution. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (3.6).

All plan sponsors are sent monthly custodian activity reports.

Control Objective 4 - Loan Processing

Controls provide reasonable assurance that participant loans are: (1) authorized by the participant; (2) approved by the plan sponsor (as applicable); and (3) recorded in Relius in accordance with the terms of the plan document and loan policy in an accurate and complete manner.

Participants may request a loan by completing a paper or online loan application via the website.

Loans Requested Via an Online Loan Application

The participant is required to enter their unique user ID and password to access their account via the website (4.1). The participant is then required to enter the loan amount and number of payments. Relius calculates the re-payment amount based upon the loan amount and number of payments entered, the payroll frequency, and the interest rate setup in Relius (See Control Objective No. 1 - New/Conversion Plan Setup). The participant is required to submit the loan.

Once submitted, the request is stored in a pending file until the Relius website trade confirmations are run, which creates the loan transaction in Relius. A member of the Operations team reviews a report and posts the loans in Relius. A truth-in-lending disclosure and an amortization schedule are generated from Relius for each loan submitted.

At least annually, Ingham submits a test loan via the website to verify that loans are accurately recorded in Relius (4.2).

Loans Requested Via a Paper Loan Application

Participants must sign a loan application and forward it to the plan sponsor for approval prior to submitting it to Ingham. Upon receipt, the loan application is reviewed to verify that it has been signed by the participant and the plan sponsor. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (4.3).

Once verified, the loan amount, interest rate, number of payments and payroll frequency are entered into Relius from the loan application. Relius calculates the re-payment amount based upon the loan

amount, number of payments, payroll frequency, and interest rate entered into Relius. Once entered, the loan is processed in Relius and an amortization schedule is generated from Relius. The loan amount, interest rate, and term on the amortization schedule are compared to the loan application noting agreement. A member of the Operations Team or Client Services Team electronically signs the workflow system to evidence the review performed (4.4). Once verified, the loan is posted in Relius.

The payee and loan amount on the loan distribution statement are compared to the amortization schedule noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (4.5). Once verified, the Client Services Team sends an email with the amortization schedule and truth-in-lending disclosure to the plan sponsor.

Loans Requested Via an Online or Paper Loan Application

Relius calculates the maximum loan amount available. If the amount entered exceeds the maximum amount allowed, Relius generates an error message noting that the amount entered exceeds the maximum (4.6).

Relius verifies that the loan is in accordance with the maximum number of outstanding loans allowed, minimum amount, and maximum term for general or residential loans as setup in Relius (See Control Objective No. 1 - New/Conversion Plan Setup). If the participant has exceeded the maximum number of loans allowed or the minimum amount or maximum term entered is not in accordance with the setup, Relius will not allow the loan to be submitted (4.7).

Once the loan is posted in Relius, a ledger is generated detailing the cash to be raised. The cash to be raised on the ledger is compared to the loan application or amortization schedule noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed (4.8).

For plans that have Reliance, FDTPA, or Schwab as the paying agent, the check instructions (e.g., payee, address, and amount) are exported from Relius into a file or are manually entered on a form. The check instructions are compared to the loan application or amortization schedule noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed (4.9). Once verified, the check instructions are sent to the paying agent.

All plan sponsors are sent monthly custodian activity reports.

Control Objective 5 - Transfers and Investment Elections

Controls provide reasonable assurance that transfers and investment election changes are recorded in Relius in an accurate and timely manner.

Transfers and investment election changes are submitted via the website or on a paper form.

Transfers and Investment Election Changes Submitted via the Website

The participant is required to enter their user ID and password to access their account via the website (5.1). For investment election changes or transfer realignments, the participant is required to enter the percentage to invest in a specific investment option. For transfers from one fund to another, the participant is required to enter the percentage or dollar amount of each fund to liquidate, and the percentage or dollar amount of the proceeds to invest in a specific investment option.

Relius displays the investment options selected and the respective percentages to the participant. The participant is required to submit the request for further processing. Once submitted, the request is stored in a pending file until the Relius website trade confirmation is run, which updates Relius with the participant's new investment elections and generates trades for transfers.

At least annually, Ingham submits a test transfer and investment election change via the website to verify that the transfers and investment election changes are accurately recorded in Relius within one business day of submission via the website (5.2).

Transfers and Investment Election Changes Submitted on a Paper Form

Investment election changes or transfer requests are manually entered into the CSR module by a member of the Operations team within three business days of receipt of the paper form. Investment elections for new enrollments are manually entered into Relius prior to processing the participant's next contribution. Ingham monitors that transfers and investment elections are entered in Relius within three business days (5.3).

The transfer or investment election change percentages in Relius are compared to the form to verify accuracy, and a member of the Operations Team electronically signs the workflow system to evidence the review performed (5.4). If the participant has an email on file than an automatic confirmation statement is sent once the investment election process has been submitted.

Transfers and Investment Election Changes Submitted via the Website

Relius will not accept transfers or investment election changes that do not equal 100% (5.5).

Control Objective 6 - Trading

Controls provide reasonable assurance that trades are recorded in Relius in an accurate and timely manner.

Trades posted to the buy/sell file in Relius (See Control Objectives No. 2, 3, 4, and 5) are assigned a unique order identification (ID) number. Relius systematically exports trades to a file which is sent electronically to the custodian by the trading deadline. (6.1). Trades are sent to the custodian to be executed on the business day of receipt for transfers submitted or entered before 3:00 PM ET. Trades are sent to be executed the following business day for transfers submitted or entered after 3:00 PM ET.

After the trades have been executed, a transaction file is received from the custodian with the actual trade dollars/shares, which is imported into Relius. Relius compares order ID numbers from the trade file stored in Relius to the transaction file received from the custodian. Once trades are matched, the trades are settled and posted to participant accounts.

If an error occurred in settling the trades or the trades were not settled within one business day, the units in Relius would not reconcile to the custodian (6.2) (See Control Objective No. 8 - Reconciliation).

Control Objective 7 - Dividends

Controls provide reasonable assurance that dividends are recorded in the plan within Relius in an accurate and timely manner.

An electronic file is received from FDTA, or Schwab detailing the date, dollar amount, and units to be allocated as a result of the dividend. The file is imported into Relius.

Once imported, the dividend is posted in Relius which allocates the dividend to participant accounts based on each participant's account balance in Relius as of the date provided by FDTPA or Schwab (7.1).

If an error occurred in allocating the dividend to the plan or if the dividend was not allocated within one business day, the units in Relius would not reconcile to the custodian (7.2) (See Control Objective No. 8 - Reconciliation).

Control Objective 8 - Reconciliation

Controls provide reasonable assurance that asset records are completely and accurately reconciled to plan records in a timely manner.

An electronic file is received each business day from each custodian detailing the units held by fund and the un-invested cash balance for each plan. Each business day Relius generates a Reconciliation Report for each custodian identifying funds for each plan that do not reconcile. Unit discrepancies for mutual funds are resolved as necessary. In addition, the un-invested cash balance is reconciled for each plan. A member of the Operations Team notates the Reconciliation Report to evidence the review performed (8.1).

The reconciliation of the market values to the plan totals in Relius are performed by the Operations Supervisor quarterly and documented in the Quarterly Reconciliation Spreadsheet (8.2).

Control Objective 9 - Reporting

Controls provide reasonable assurance that quarterly reports reflect account balances in Relius in an accurate manner and are sent to the plan sponsor and/or participant in a timely manner.

Ingham generates the following reports from Relius on a quarterly basis:

- Allocation Report - details the plan total beginning account balance, activity, and ending account balance by fund for each source and the total.
- Loan Ledger - details the last payment date and ending loan balances by participant and plan total.

The reports are reviewed by an Ingham Consultant, a member of the Client Services Team or Administration Team to verify that:

- a. The plan total beginning balance on the Allocation Report agrees to the ending balance on the prior quarter's Allocation Report.
- b. The Allocation Report agrees to the total on the Relius Participant Account Balance Report.
- c. Transfers on the Allocation Report net to zero or an explanation of the difference is provided.
- d. The plan total loan balance on the Allocation Report agrees to the Loan Ledger.

An Ingham Consultant, a member of the Client Services Team or Administration Team then electronically signs the workflow system to evidence the review performed (9.1).

Ingham generates individual participant statements from Relius detailing the participant's beginning account balance, activity and ending account balance by fund for each source and the total. A selection of participant statements is reviewed by an Ingham Consultant, a member of the Client Services Team or Administration Team to verify that:

- a. The beginning balance agrees to the ending balance on the prior quarter's statement.
- b. The ending balance on the statement agrees to the Participant Account Balance Report.

An Ingham Consultant, a member of the Client Services Team or Administration Team then then electronically signs the workflow system to evidence the review performed (9.2). Discrepancies noted in the quarterly review process are documented and resolved as necessary.

Reports are posted to the plan sponsor website and participant statements are mailed to the participants (or to the plan sponsor for distribution to participants) within 20 business days of quarter end. Ingham monitors that reports and statements were sent to the plan sponsor and/or participant within 20 business days of quarter end and a member of the Client Services Team or Administration Team electronically signs the workflow system to evidence the monitoring performed (9.3).

Control Objective 10 - Relius Software Maintenance

Controls provide reasonable assurance that Relius software and related database changes relevant to user entities' internal control over financial reporting are approved prior to implementation into the Ingham production environment.

Ingham is informed via emails of application changes to Relius, the Relius web interface as released by FIS. The respective department head reviews the overall impact and specific details of the software change that may include any related database changes.

For certain major software changes that may include any related database changes, the change is downloaded by Ingham to a test environment consisting of a database, a Microsoft Internet Information Server (IIS), web server, and a local install of Relius. A group of Relius power users perform functional testing of the major software change.

The respective department head approves the minor and major software change that may include any related database changes after testing, as applicable, to be implemented into the production environment via the change control form and implementation dates are captured in the form (10.1). Access to implement the software changes into the production environment is restricted to authorized and appropriate personnel (10.2).

Control Objective 11 - Internet Data Authenticity

Controls provide reasonable assurance that connections to <https://www.ingham.com> and <https://accounts.ingham.com> websites are configured to protect data relevant to user entities' internal control over financial reporting from unauthorized access.

Ingham hosts the following websites:

- <https://www.ingham.com/>
- <https://accounts.ingham.com/>

To protect against disclosure to third parties, the above websites transmit data utilizing Hypertext Transfer Protocol Secure (HTTPS) using Transport Layer Security (TLS) encryption which enables 256-bit and 128-bit encryption, respectively, when communicating with Internet browsers (11.1). Ingham uses a trusted certificate authority, Network Solutions L.L.C. for the <https://www.ingham.com> and <https://accounts.ingham.com> websites to inform users that websites are authentic (11.2). On the

<https://www.ingham.com website>, users are required to go to Account Access and select Plan Login. On the <https://accounts.ingham.com website>, users can logon. In order for user entities (plan sponsors) and participants to gain access to their accounts via the website, they are required to use a user ID and password (11.3). Users are authenticated against the application on the web server upon logging into their accounts through use of an application level user ID and password. Password security parameters for the <https://accounts.ingham.com> website include the following requirements (11.4):

- Change initial password upon first logon
- Account lockout after a set number of unsuccessful logon attempts

Control Objective 12 - Logical Security

Controls provide reasonable assurance that logical access to the network, Relius, and Relius database relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate users and such users are restricted to performing authorized and appropriate actions.

The IT Manager or Network Administrator is responsible for assigning and maintaining access rights to the network and computer systems in general. The Relius Administrator is responsible for assigning user access to Relius. Administrator access to the network and Relius are restricted to authorized personnel (12.1).

To authorize network, Relius, and Relius database access, the employees' department head or their superior completes and signs the Ingham Group Information Technology Staffing Requisition Form (form), and forwards it to the IT Department. The IT Manager or Network Administrator sets up the network access. The Relius Administrator sets up access to Relius and Relius database, as applicable. When network access is provided, remote access is also provided (12.2).

To delete network, Relius, and Relius database access, the employees' department head or their superior completes and signs a form. The IT Manager or Network Administrator deletes the network access, and the Relius Administrator deletes the Relius and Relius database access, as applicable, and signs the form to confirm that the access was deleted. When network access is deleted, remote access is also deleted (12.3).

There were no requests to modify network, Relius, or Relius database access during the SOC examination period.

Access to the network requires the user to enter a unique user ID and password (12.4). Password security parameters for the network include the following requirements (12.5):

- Minimum password length
- Password complexity - enabled
- Maximum password age
- Password history
- Account lockout after a set number of unsuccessful logon attempts

Users must authenticate against the network prior to accessing Relius. Access to Relius requires the user to enter a unique user ID and password (12.6). Relius menu and transaction restrictions have been implemented (12.7). Password security parameters for Relius include the following requirements (12.8):

- Minimum password length
- Minimum characters in the password
- Maximum password age

Relius uses an Oracle database. System accounts within Relius are used by the IT Manager or Network Administrators to access the Oracle database (the Relius database) (12.9). Administrator, i.e., direct, access to the Relius database requires a unique user ID and password and is restricted to authorized personnel (12.10).

Control Objective 13 - Network Security

Controls provide reasonable assurance that connections to the Internet are configured to protect data relevant to user entities' internal control over financial reporting from unauthorized access.

An industry standard firewall resides on the production environment at ColoHouse (13.1). The firewall analyzes the data and packets routed through the production environment. The firewall is managed and configured by the IT Department. Firewall rules are configured based on the concept of least privilege meaning unless specifically granted, access is denied.

The firewall on the production environment that resides at ColoHouse provides a log of events and activities that are reviewed by the Network Administrator daily. The reviewer notates the log to evidence the review performed (13.2). Any issues or discrepancies uncovered during the log reviews are escalated to the IT Manager. Beginning April 27, 2019, Ingham installed additional network monitoring tools by deploying the services of a monitoring company SECNAP, which uses the tool "CloudJacketX" (Intrusion Detection and Prevention System (IPS/IDS) - Network Detection and Prevention Technology) to actively monitor Ingham network traffic 24/7 for unusual activities, intrusion attempts and transmission of sensitive information. SECNAP monitors and logs all activities and observations of a serious nature are immediately notified to the Ingham IT. Ingham IT investigates any serious incident and resolves the serious incident in coordination with SECNAP that is tracked via a ticket system (13.3).

Ingham utilizes Virtual Private Network (VPN) technology to restrict remote access to the network (13.4). Ingham utilizes the VPN technology to only allow authorized users to connect to and query network servers remotely. Access to the VPN requires the user to enter a unique user ID and password (13.5). After establishing a connection with an Internet Service Provider (ISP), the VPN is configured to require users to connect to the Cisco AnyConnect VPN which establishes a Secure Socket Layer (SSL) tunnel that utilizes RSA-2048 bits encryption (13.6).

Antivirus software is installed to protect the servers and workstations from malicious code or viruses (13.7). Virus signature definition files are configured to automatically update daily for servers and workstations (13.8). Virus scans are configured to run daily for servers and workstations (13.9).

Control Objective 14 - Physical Security

Controls provide reasonable assurance that physical access to the office, corporate office server room, and ColoHouse colocation facility housing computers and other resources relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate personnel.

ColoHouse provides the physical security controls for the production environment (where Relius resides) and ColoHouse controls are excluded from the scope of this description.

The main Ingham corporate office is located on an elevated floor in an office building in Miami, Florida. The building perimeter consists of a parking lot and garage.

During business hours, Monday through Thursday, 8:30 AM to 5:00 PM and Friday, 8:30 AM to 4:00 PM ET, a receptionist is stationed in the lobby to monitor visitors (14.1). Visitors must check in with the receptionist, sign the Visitor Log, and are provided with a visitor badge (14.2). Visitors are met by an Ingham employee and escorted within the office (14.3). Office access during non-business hours requires the use of a key fob (14.4).

Corporate office server room access also requires the use of a separate key fob (14.5). Access to the corporate office server room is restricted to IT personnel (14.6). The local physical servers (domain controller and print server) and network hardware are stored in free-standing mounted cabinets in the corporate office server room. The file servers are located at ColoHouse.

To authorize office, corporate office server room, and ColoHouse colocation facility access, the respective department head or their superior completes and signs a form (14.7) and distributes the office and corporate office server room key fobs or contacts ColoHouse to provide access to the colocation facility, as applicable. Ingham maintains a list of authorized personnel with office and corporate office server room key fobs and ColoHouse colocation facility access.

To delete office, corporate office server room, and ColoHouse colocation facility access, the respective department head or their superior collects the office and corporate office server room key fobs or contacts ColoHouse to delete access to the colocation facility, as applicable. The fobs are disabled as part of the user access deletion as evidenced on the Fob Log. The respective department head or their superior signs a form to evidence that the fobs were collected and disabled or confirmation that ColoHouse deleted access to the colocation facility (14.8).

The building employs a Closed Circuit Television (CCTV) system to record activities at both the exterior and the interior of the building (14.9). Building security personnel monitor the activity from the CCTV 24 hours a day 7 days a week (24/7) (14.10).

Control Objective 15 - Data Backup

Controls provide reasonable assurance that data relevant to user entities' internal control over financial reporting is backed up at appropriate intervals and are stored offsite.

Ingham employs a hot site at ColoHouse located in Downtown Miami, Florida. In addition, backups at ColoHouse are performed utilizing Veritas Backup Exec to Linear Tape Open (LTO) tapes that are identified with a unique tracking number (15.1) according to the following schedule (15.2):

- Daily differential backups -Daily
- Full backups - Daily
- Relius transactional logs are backed up every four hours (6 times a day)

The IT Manager or Network Administrator reviews the success or failure of backup jobs daily and notates the Daily IT Infrastructure Health-Check Report to evidence the review performed. Failed backups are investigated and resolved, if necessary and the Network Administrator notates the Daily IT Infrastructure Health-Check Report to evidence the review performed (15.3). Backup tapes from ColoHouse are stored in a fire resistant safe in the corporate office server room (15.4).

The IT Manager or Network Administrator performs restores based on user requests and sends an email to the user to confirm that the restore was performed successfully (15.5).

Complementary Subservice Organization Controls (CSOCs)

Ingham’s controls related to the defined contribution retirement plan administration system cover only a portion of the overall internal control for each user entity of Ingham’s defined contribution retirement plan administration system. It is not feasible for the control objectives related to the defined contribution retirement plan administration system to be achieved solely by Ingham. Certain control objectives specified in the description can be achieved only if complementary subservice organization controls contemplated in the design of Ingham’s controls are suitably designed and operating effectively, along with controls at Ingham. Therefore, each user entity’s internal control over financial reporting should be evaluated in conjunction with Ingham’s controls and the related tests and results described in Section IV, taking into account the related complementary subservice organization controls expected to be implemented and operating effectively at the subservice organizations as described below.

#	Complementary Subservice Organization Controls (CSOCs)	Applicable Control Objective (CO)
1.	Controls are in place and operating effectively to ensure that formal software development and change management controls are in place and followed by FIS and SECNAP for any systems used to provide services to Ingham.	CO 10
2.	Controls are in place and operating effectively to ensure that logical, physical, and environmental safeguards are in place at FIS, ColoHouse, and SECNAP.	CO 12 & 13
3.	Controls should be in place and operating effectively to ensure that notifications provided by SECNAP to Ingham on network intrusion detection and prevention monitoring issues are timely.	CO 13

Complementary User Entity Controls (CUECs)

Ingham’s controls related to the defined contribution retirement plan administration system cover only a portion of the overall internal control of each user entity of Ingham. It is not feasible for the control objectives related to the defined contribution retirement plan administration system to be solely achieved by Ingham. Certain control objectives specified in the description can be achieved only if

Solely for the information and use of Ingham Retirement Group, user entities of Ingham Retirement Group’s defined contribution retirement plan administration system during some or all of the period January 1, 2019 to December 31, 2019, and their auditors who audit and report on user entities’ financial statements or internal control over financial reporting and have a sufficient understanding of it.

complementary user entity controls contemplated in the design of Ingham’s controls are suitably designed and operating effectively, along with controls at Ingham.

Therefore, each user entity’s internal control over financial reporting should be evaluated in conjunction with Ingham’s controls and the related tests and results described in this report, taking into account the related complementary user entity controls identified below, where applicable. In order for user entities to rely on the controls reported herein, each user entity must evaluate its own internal control to determine whether identified complementary user entity controls have been implemented and are operating effectively.

#	Complementary User Entity Controls (CUECs)	Applicable Control Objective (CO)
1.	Plan sponsors should have controls in place and operating effectively to provide current signed plan documents and amendments to Ingham on a timely basis.	CO 1
2.	Plan sponsors should have controls in place and operating effectively to provide complete and accurate participant census data and investment elections to Ingham.	CO 1
3.	Plan sponsors should have controls in place and operating effectively to ensure that prior service providers provide complete and accurate account balances, participant census data, investment elections and vesting percentages, as applicable, to Ingham.	CO 1
4.	Plan sponsors should have controls in place and operating effectively to notify Ingham on a timely basis if any discrepancies are noted in the plan setup process including any errors related to vesting calculations.	CO 1
5.	Plan sponsors should have controls in place and operating effectively to provide complete and accurate participant census and contribution and loan repayment information to Ingham on a timely basis.	CO 2
6.	Plan sponsors should have controls in place and operating effectively to remit contribution and loan repayment dollars to the custodian on a timely basis.	CO 2
7.	Plan sponsors should have controls in place and operating effectively to provide complete and accurate distribution request forms in accordance with the plan document.	CO 3
8.	Plan sponsors should have controls in place and operating effectively to ensure that participants provide complete and accurate distribution election forms in accordance with the plan document.	CO 3
9.	Plan sponsors should have controls in place and operating effectively to review the monthly custodian activity reports. Any discrepancies should be reported to Ingham.	CO 3
10.	Plan sponsors should have controls in place and operating effectively to provide complete and accurate loan applications in accordance with the plan document and loan policy.	CO 4
11.	Plan sponsors should have controls in place and operating effectively to ensure that participants provide complete and accurate loan applications in accordance with the plan document and loan policy.	CO 4

#	Complementary User Entity Controls (CUECs)	Applicable Control Objective (CO)
12.	Plan sponsors should have controls in place and operating effectively to require the participant to sign the truth-in-lending disclosure.	CO 4
13.	Plan sponsors should have controls in place and operating effectively to update the payroll records with complete and accurate loan repayment amounts on a timely basis.	CO 4
14.	Plan sponsors should have controls in place and operating effectively to review the monthly custodian activity reports. Any discrepancies should be reported to Ingham.	CO 4
15.	Plan sponsors should have controls in place and operating effectively to ensure participants review email confirmations to verify that transfer or investment election change requests were processed accurately and that discrepancies are reported to Ingham on a timely basis.	CO 5
16.	Plan sponsors should have controls in place and operating effectively to review quarterly plan reports and statements for accuracy and completeness. Discrepancies should be reported to Ingham on a timely basis.	CO 9
17.	Plan sponsors should have controls in place and operating effectively to ensure participants review quarterly statements for accuracy and completeness. Discrepancies should be reported to Ingham on a timely basis.	CO 9
18.	Plan sponsors should have controls in place and operating effectively to ensure that logical access to their plan sponsor website, for any personnel who can access the plan information, is appropriate based upon job responsibility.	CO 11
19.	Plan sponsors should have controls in place and operating effectively to instruct participants to keep their participant website user ID and password confidential.	CO 11
20.	Plan sponsors should have controls in place and operating effectively to maintain the integrity of any Internet Protocol (IP) based connections to Ingham even from inside their own connections to other outside sources they interact with (e.g., the Internet, third-party networks, and non-contracted affiliates).	CO 13

**IV. INGHAM RETIREMENT GROUP'S DESCRIPTION OF ITS
CONTROL OBJECTIVES AND RELATED CONTROLS, AND
INDEPENDENT SERVICE AUDITOR'S DESCRIPTION OF
TESTS OF CONTROLS AND RESULTS OF TESTS**

Ingham Retirement Group's Description of Its Control Objectives and Related Controls, and Independent Service Auditor's Description of Tests of Controls and Results of Tests

Information Provided by the Independent Service Auditor

Introduction

This report, when combined with an understanding of the controls at user entities, is intended to assist auditors in planning the audit of user entities' financial statements or user entities' internal control over financial reporting and in assessing control risk for assertions in user entities' financial statements that may be affected by controls at Ingham Retirement Group (Ingham). The examination was performed in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) Statement on Standards for Attestation Engagements No. 18 (SSAE 18); specifically, AT-C Section 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities Internal Control Over Financial Reporting*.

Our examination was limited to the control objectives and related controls specified by Ingham in Section IV and did not encompass all aspects of the services provided or controls of Ingham or extend to controls performed by user entities. Unique processes or control situations not described in the description are outside the scope of this examination.

The scope of the examination included tests of the operating effectiveness of controls over Ingham's defined contribution retirement plan administration system including controls related to changes to the software but did not include tests related to the functioning of or calculations performed by the software used in the delivery of the system or of reports generated by the software.

It is the responsibility of each user entity and its independent auditor to evaluate this information in conjunction with the evaluation of internal control over financial reporting at the user entity in order to assess the total internal control. If internal control is not effective at user entities, Ingham's controls may not compensate for such weaknesses.

Ingham's internal control represents the collective effect of various factors on establishing or enhancing the effectiveness of the controls specified by Ingham. In planning the nature, timing, and extent of our testing of the controls to achieve the control objectives specified by Ingham, we considered aspects of Ingham's control environment, risk assessment process, monitoring activities, and information and communications.

Tests of Controls

Our testing of controls was restricted to the controls specified by Ingham and was not extended to controls performed by user entities or other controls which were not documented as tested under each control objective listed in this section of the report.

The description of tests of controls and results of those tests are presented in this section of the report and are the responsibility of BDO USA, LLP, the service auditor. The description of control objectives, the related controls, and the complementary subservice organization and user entity controls to achieve the objectives have been specified by, and are the responsibility of, Ingham.

Testing of the control activities were performed using the following methods:

Test	Description
Inquiry	Inquired of appropriate personnel and corroborated responses with management.
Observation	Observed the application, performance, or existence of the specific control(s) as represented by management.
Inspection	Inspected documents and records indicating performance of the control.
Reperformance	Reperformed the control or processing application to ensure the accuracy of its operation.

Information Provided by the Entity

When using information produced by the service organization, we evaluated whether the information was sufficiently reliable for our purposes by obtaining evidence about the accuracy and completeness of such information and evaluating whether the information was sufficiently precise and detailed for our purposes.

Control Objective 1: New/Conversion Plan Setup		
Controls provide reasonable assurance that new/conversion plan specifications, account balances, and investment elections are recorded in Relius in an accurate, complete and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>1.1 The plan specifications in Relius are reviewed for accuracy and a member of the Administration Team electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selected conversion plan, re-performed the control procedure by comparing certain plan specifications on the plan document to the plan specifications in Relius and determined that the data matched.</p> <p>For a selection of new or conversion plans, inspected the New Plan/Conversion Checklist and determined that a member of the Administration Team electronically initialed and dated the applicable section of the checklist either by the go live date or when all balances are received from the plan sponsor providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>
<p>1.2 A selection of participants' investment elections in the electronic file or each participant's investment elections received on an enrollment form, as applicable, are compared to Relius noting agreement. A member of the Administration Team, Client Services Team, or Operations Team electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor.</p> <p>(Note: The control is only applicable, if investment elections are received on paper forms.)</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selected new plan, re-performed the control procedure by comparing a selected participant's investment elections on an enrollment form to the investment elections in Relius and determined that the data matched.</p> <p>For a new plan and the only conversion plan receiving paper investment election forms, inspected the New Plan/Conversion Checklist and determined that a member of the Client Services or Operations Team electronically initialed and dated the applicable section of the checklist by the go live date providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>

Solely for the information and use of Ingham Retirement Group, user entities of Ingham Retirement Group's defined contribution retirement plan administration system during some or all of the period January 1, 2019 to December 31, 2019, and their auditors who audit and report on user entities' financial statements or internal control over financial reporting and have a sufficient understanding of it.

Control Objective 1: New/Conversion Plan Setup		
Controls provide reasonable assurance that new/conversion plan specifications, account balances, and investment elections are recorded in Relius in an accurate, complete and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>1.3 The plan total and a selection of participant conversion balances in Relius are compared to the ending balances on the prior service provider statements noting agreement. A member of the Administration Team or the Operations Supervisor electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selected participant in a conversion plan, re-performed the control procedure by comparing the balances in Relius to the ending balances on the prior service provider statements and determined that the data matched.</p> <p>For a selection of conversion plans, inspected the New Plan/Conversion Checklist and determined that a member of the Administration Team or the Operations Supervisor electronically initialed and dated the applicable section of the checklist either by the go live date or when all balances are received from the plan sponsor providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>

Control Objective 1: New/Conversion Plan Setup		
Controls provide reasonable assurance that new/conversion plan specifications, account balances, and investment elections are recorded in Relius in an accurate, complete and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>1.4 The vested percentage calculated by Relius is compared to the vested percentage on the prior service provider statements, if provided, or the vested percentage manually calculated by Ingham. A member of the Administration Team electronically initials and dates the applicable section of the New Plan/Conversion Checklist to evidence the review performed. The review is performed timely, either by the go live date or when all balances are received from the plan sponsor.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selected participant in a conversion plan, re-performed the control procedure by comparing the vested percentage on the prior service provider statements to the vested percentage in Relius and determined that the data matched.</p> <p>For a selection of conversion plans, inspected the New Plan/Conversion Checklist and determined that a member of the Administration Team electronically initialed and dated the applicable section of the checklist either by the go live date or when all balances are received from the plan sponsor providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>

Control Objective 2: Contribution and Loan Repayment Processing		
Controls provide reasonable assurance that contributions and loan repayments are recorded in the plan within Relius in an accurate, complete, and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>2.1 <u>Contribution and Loan Repayment Information Received in an Electronic File or via the DVC</u></p> <p>The total contributions and loan repayments on the Advice of Investment Remittance Statement or Import Census Report is compared to the cash received by the custodian in the Cash Receipt Report noting agreement. A member of the Operations Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select contributions and loan repayments, re-performed the control procedure by comparing the total contribution on the Advice of Investment Remittance Statement or Import Census Report to the Cash Receipt Report and determined that the data matched.</p> <p>For a selection of contributions and loan repayments, inspected the workflow system and determined that a member of the Operations Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.
<p>2.2 <u>Contributions and Loan Repayment Information Received via the DVC</u></p> <p>The plan sponsor must enter a user name and password to upload the electronic file detailing contribution and loan repayment information via the DVC.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Observed that the DVC requires a username and password to upload the electronic file via the DVC.</p>	No exceptions noted.

Control Objective 2: Contribution and Loan Repayment Processing		
Controls provide reasonable assurance that contributions and loan repayments are recorded in the plan within Relius in an accurate, complete, and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>2.3 <u>Contribution and Loan Repayment Information Received in an Electronic File or via the DVC</u></p> <p>Total contributions by source and loan repayments on the source totals are compared to the Advice of Investment Remittance Statement or Import Census Report noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select contributions and loan repayments, re-performed the control procedure by comparing the balances on the source totals to the Advice of Investment Remittance Statement or Import Census Report and determined that the data matched.</p> <p>For a selection of contributions and loan repayments, inspected the workflow system and determined that a member of the Operations Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.
<p>2.4 <u>Contribution and Loan Repayment Information Received in an Electronic File</u></p> <p>The totals on the Import Census Report are compared to the Advice of Investment Remittance Statement noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed.</p> <p><u>Contribution and Loan Repayment Information Received in an Electronic File or via the DVC</u></p> <p>The total on the trade details is compared to the Advice of Investment Remittance Statement or Import Census Report noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a select contributions and loan repayment, re-performed the control procedure by comparing the totals on the Import Census Report to the Advice of Investment Remittance Statement and the total on the trade details to the Advice of Investment Remittance Statement or Import Census Report and determined that the data matched.</p> <p>For a selection of contributions and loan repayments, inspected the workflow system and determined that a member of the Operations Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.

Control Objective 2: Contribution and Loan Repayment Processing		
Controls provide reasonable assurance that contributions and loan repayments are recorded in the plan within Relius in an accurate, complete, and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>2.5 <u>Contribution and Loan Repayment Information Received in an Electronic File or via the DVC</u></p> <p>Ingham monitors that contributions and loan repayments were processed and trades were sent to the custodian within three business days of receipt of complete and accurate contribution and loan repayment information from the plan sponsor and notification of receipt of funds at the custodian. A member of the Operations Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of contributions and loan repayments, compared the dates and determined that contributions and loan repayments were processed and trades were sent to the custodian within three business days of receipt of complete and accurate contribution and loan repayment information from the plan sponsor and notifications of receipt of funds at the custodian.</p> <p>For a selection of contributions and loan repayments, inspected the workflow system and determined that a member of the Operations Team electronically signed the workflow task providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>

Control Objective 3: Distribution Processing		
Controls provide reasonable assurance that distributions are: (1) approved by the plan sponsor, as applicable; (2) authorized by the participant or their beneficiary; (3) recorded in Relius in an accurate manner; and (4) processed in a timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>3.1 The request for distribution form is reviewed to verify that the request has been signed by, requested, or approved by the plan sponsor. A member of the Client Services Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select distributions, re-performed the control procedure by reviewing the distribution form and determined that the request was signed, requested, or approved by the plan sponsor.</p> <p>For a selection of distributions, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.
<p>3.2 Once the distribution election forms are received, the forms are reviewed to verify that forms have been signed by the participant and spouse (as applicable), and for the second method, also signed by the plan sponsor. A member of the Client Services Team electronically signs the workflow system to evidence the review performed</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of distributions, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.
<p>3.3 Vesting is calculated based upon the terms of the plan document and compared to the vesting calculated by Relius noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of distributions, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.

Control Objective 3: Distribution Processing		
Controls provide reasonable assurance that distributions are: (1) approved by the plan sponsor, as applicable; (2) authorized by the participant or their beneficiary; (3) recorded in Relius in an accurate manner; and (4) processed in a timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>3.4 The Distribution Statement and check instructions are reviewed to verify that the distribution was accurately deducted from the participant's account. A member of the Operations Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select distributions, re-performed the control procedure by reviewing the Distribution Statement and check instructions and determined that the distribution was accurately deducted from the participant's account.</p> <p>For a selection of distributions, inspected the workflow system and determined that a member of the Operations Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>
<p>3.5 The payee, distribution amount and tax withholding, as applicable, are compared to the distribution election form or Distribution Statement, as applicable, noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select distributions, re-performed the control procedure by comparing the payee, distribution amount and tax withholding, as applicable, to the distribution election form or Distribution Statement, as applicable, and determined that the data matched.</p> <p>For a selection of distributions, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>

Control Objective 3: Distribution Processing		
Controls provide reasonable assurance that distributions are: (1) approved by the plan sponsor, as applicable; (2) authorized by the participant or their beneficiary; (3) recorded in Relius in an accurate manner; and (4) processed in a timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>3.6 Ingham monitors that distributions were processed, and check instructions were sent to the plan sponsor or paying agent, as applicable, within eight business days after receipt of complete and accurate distribution forms and receipt of the participant's last contribution. A member of the Client Services Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of distributions, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed and that distributions were processed and check instructions were sent to the plan sponsor or paying agent, as applicable, within eight business days.</p>	<p>No exceptions noted.</p>

Control Objective 4: Loan Processing		
Controls provide reasonable assurance that participant loans are: (1) authorized by the participant; (2) approved by the plan sponsor (as applicable); and (3) recorded in Relius in accordance with the terms of the plan document and loan policy in an accurate and complete manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<u>Loans Requested Via an Online Loan Application</u> 4.1 The participant is required to enter their unique user ID and password to access their account via the website.	Inquired of Ingham personnel and corroborated the control procedure described. Observed that the website requires a user ID and password to access an account via the website.	No exceptions noted.
4.2 At least annually, Ingham submits a test loan via the website to verify that loans are accurately recorded in Relius.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the testing performed by Ingham for a test loan and determine that the loan submitted via the website was accurately recorded in Relius.	No exceptions noted.
<u>Loans Requested Via a Paper Loan Application</u> 4.3 The loan application is reviewed to verify that it has been signed by the participant and the plan sponsor. A member of the Client Services Team electronically signs the workflow system to evidence the review performed.	Inquired of Ingham personnel and corroborated the control procedure described. For a selection of paper loan applications, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.	No exceptions noted.

Control Objective 4: Loan Processing		
Controls provide reasonable assurance that participant loans are: (1) authorized by the participant; (2) approved by the plan sponsor (as applicable); and (3) recorded in Relius in accordance with the terms of the plan document and loan policy in an accurate and complete manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>4.4 The loan amount, interest rate, and term on the amortization schedule are compared to the loan application noting agreement. A member of the Operations Team or Client Services Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select paper loan applications, re-performed the control procedure by comparing the loan amount, interest rate, and term on the amortization schedule to the loan application and determined that the data matched.</p> <p>For a selection of paper loan applications, inspected the workflow system and determined that a member of the Operations Team or Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>
<p>4.5 The payee and loan amount on the loan distribution statement are compared to the amortization schedule noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select paper loan applications, re-performed the control procedure by comparing the payee and loan amount on the statement to the amortization schedule and determined that the data matched.</p> <p>For a selection of paper loan applications, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>

Control Objective 4: Loan Processing		
Controls provide reasonable assurance that participant loans are: (1) authorized by the participant; (2) approved by the plan sponsor (as applicable); and (3) recorded in Relius in accordance with the terms of the plan document and loan policy in an accurate and complete manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p><u>Loans Requested Via an Online or Paper Loan Application</u></p> <p>4.6 Relius calculates the maximum loan amount available. If the amount entered exceeds the maximum amount allowed, Relius generates an error message noting that the amount entered exceeds the maximum.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a test loan, observed that Relius generated an error message when the loan amount entered exceeded the maximum amount allowed.</p>	No exceptions noted.
<p>4.7 Relius verifies that the loan is in accordance with the maximum number of outstanding loans allowed, minimum amount and maximum term for general or residential loans as setup in Relius. If the participant has exceeded the maximum number of loans allowed or the minimum amount or maximum term entered is not in accordance with the setup, Relius will not allow the loan to be submitted.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a test loan, observed that Relius does not allow a loan to be submitted if the participant has exceeded the maximum number of loans allowed or the minimum amount or maximum term is not in accordance with the setup in Relius.</p>	No exceptions noted.
<p>4.8 The cash to be raised on the ledger is compared to the loan application or amortization schedule noting agreement, and a member of the Operations Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select paper loan applications, re-performed the control procedure by comparing the employee totals to the loan application or amortization schedule and determined that the data matched.</p> <p>For a selection of paper loan applications, inspected the workflow system and determined that a member of the Operations electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.

Control Objective 4: Loan Processing		
Controls provide reasonable assurance that participant loans are: (1) authorized by the participant; (2) approved by the plan sponsor (as applicable); and (3) recorded in Relius in accordance with the terms of the plan document and loan policy in an accurate and complete manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>4.9 For plans that use Reliance, FDTPA, or Schwab as the paying agent, the check instructions are compared to the loan application or amortization schedule noting agreement. A member of the Client Services Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of paper loan applications for plans that use Reliance as the paying agent, re-performed the control procedure by comparing the check instructions in the file or on the form to the amortization schedule, as applicable, and determined that the data matched.</p> <p>For a selection of paper loan applications, inspected workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>

Control Objective 5: Transfers and Investment Elections		
Controls provide reasonable assurance that transfers and investment election changes are recorded in Relius in an accurate and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<u>Transfers and Investment Election Changes Submitted via the Website</u> 5.1 The participant is required to enter their user ID and password to access their account via the website.	Inquired of Ingham personnel and corroborated the control procedure described. Observed that Relius requires the user to enter a user ID and password to access an account via the website.	No exceptions noted.
5.2 At least annually, Ingham submits a test transfer and investment election change via the website to verify that the transfers and investment election changes are accurately recorded in Relius within one business day of submission via the website.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected Ingham’s annual test documentation and determined that a transfer and investment election change submitted via the website were accurately recorded in Relius within one business day of being submitted via the website.	No exceptions noted.
<u>Transfers and Investment Election Changes Submitted on a Paper Form</u> 5.3 Ingham monitors that transfers and investment elections are entered in Relius within three business days.	Inquired of Ingham personnel and corroborated the control procedure described. For a selection of transfers and investment elections submitted on a form, inspected the workflow system and the Relius data and determined that the transfer and investment election requests were entered in Relius within three business days.	No exceptions noted.

Control Objective 5: Transfers and Investment Elections		
Controls provide reasonable assurance that transfers and investment election changes are recorded in Relius in an accurate and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>5.4 The transfer or investment election change percentages in Relius are compared to the form to verify accuracy, and a member of the Operations Team electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select transfers and investment elections on a paper form, re-performed the control procedure by comparing the transfer or investment election change percentages in Relius to the form and determined that the data matched.</p> <p>For a selection of transfers and investment election changes on a paper form, inspected the workflow system and determined that a member of the Operations Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>
<p><u>Transfers and Investment Election Changes Submitted via the Website</u></p> <p>5.5 Relius will not accept transfers or investment election changes that do not equal 100%.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Observed that Relius does not accept transfer or investment election changes that do not equal 100%.</p>	<p>No exceptions noted.</p>

Control Objective 6: Trading		
Controls provide reasonable assurance that trades are recorded in Relius in an accurate and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
6.1 Relius systematically exports trades to a file which is sent electronically to the custodian by the trading deadline.	Inquired of Ingham personnel and corroborated the control procedure described. Observed that the trades were exported from Relius to a file and were sent electronically to the custodian by the trading deadline.	No exceptions noted. Also, see Control Objective No. 8 - Reconciliation, control 8.1 for tests of controls and results of tests performed.
6.2 If an error occurred in settling the trades or the trades were not settled within one business day, the units in Relius would not reconcile to the custodian.	See Control Objective No. 8 - Reconciliation, control 8.1 for tests of controls.	See Control Objective No. 8 - Reconciliation, control 8.1 for results of tests performed.

Control Objective 7: Dividends		
Controls provide reasonable assurance that dividends are recorded in the plan within Relius in an accurate and timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
7.1 Once imported, the dividend is posted in Relius which allocates the dividend to participant accounts based on each participant's account balance in Relius as of the date provided by FDTPA or Schwab.	Inquired of Ingham personnel and corroborated the control procedure described. Observed the dividend posted in Relius and determined that the dividend was allocated to the participants account based on the participant's account balance.	No exceptions noted. Also, see Control Objective No. 8 - Reconciliation, control 8.1 for tests of controls and results of tests performed.
7.2 If an error occurred in allocating the dividend to the plan or if the dividend was not allocated within one business day, the units in Relius would not reconcile to the custodian.	See Control Objective No. 8 - Reconciliation, control 8.1 for tests of controls.	See Control Objective No. 8 - Reconciliation, control 8.1 for results of tests performed.

Control Objective 8: Reconciliation		
Controls provide reasonable assurance that asset records are completely and accurately reconciled to plan records in a timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>8.1 Each business day Relius generates a Reconciliation Report for each custodian identifying funds for each plan that do not reconcile. Unit discrepancies for mutual funds are resolved as necessary. In addition, the un-invested cash balance is reconciled for each plan. A member of the Operations Team notates the Reconciliation Report to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of business days, inspected the Reconciliation Report and determined that a member of the Operations Team notated the report providing evidence of the control procedure performed.</p>	No exceptions noted.
<p>8.2 The reconciliation of the market values to the plan totals in Relius are performed by the Operations Supervisor quarterly and documented in the Quarterly Reconciliation Spreadsheet.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of quarters, inspected the Quarterly Reconciliation Spreadsheet and determined that the Operations Supervisor reconciled the market values to the plan totals in Relius providing evidence of the control procedure performed.</p>	No exceptions noted.

Control Objective 9: Reporting		
Controls provide reasonable assurance that quarterly reports reflect account balances in Relius in an accurate manner and are sent to the plan sponsor and/or participant in a timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>9.1 The reports are reviewed by an Ingham Consultant, a member of the Client Services Team or Administration Team to verify that:</p> <ul style="list-style-type: none"> a. The plan total beginning balance on the Allocation Report agrees to the ending balance on the prior quarter's Allocation Report. b. The Allocation Report agrees to the total on the Relius Participant Account Balance Report. c. Transfers on the Allocation Report net to zero or an explanation of the difference is provided. d. The plan total loan balance on the Allocation Report agrees to the Loan Ledger. <p>An Ingham Consultant, a member of the Client Services Team or Administration Team then electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select plans and quarters, re-performed the control procedure and determined that:</p> <ul style="list-style-type: none"> a. The plan total beginning balance on the Allocation Report agrees to the ending balance on the prior quarter's Allocation Report. b. The Allocation Report agrees to the total on the Relius Participant Account Balance Report. c. Transfers on the Allocation Report net to zero or an explanation of the difference is provided. d. The plan total loan balance on the Allocation Report agrees to the Loan Ledger. <p>For a selection of plans and quarters, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedures performed.</p>	<p>No exceptions noted.</p>

Control Objective 9: Reporting		
Controls provide reasonable assurance that quarterly reports reflect account balances in Relius in an accurate manner and are sent to the plan sponsor and/or participant in a timely manner.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>9.2 A selection of participant statements are reviewed by an Ingham Consultant, a member of the Client Services Team or Administration Team to verify that:</p> <p>a. The beginning balance agrees to the ending balance on the prior quarter’s statement.</p> <p>b. The ending balance on the statement agrees to the Participant Account Balance Report.</p> <p>An Ingham Consultant, a member of the Client Services Team, or Administration Team then electronically signs the workflow system to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select plans and quarters, re-performed the control procedure and determined that:</p> <p>a. The beginning balance agrees to the ending balance on the prior quarter’s statement.</p> <p>b. The ending balance on the statement agrees to the Participant Account Balance Report.</p> <p>For a selection of plans and quarters, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedures performed.</p>	No exceptions noted.
<p>9.3 Ingham monitors that reports and statements were sent to the plan sponsor and/or participant within 20 business days of quarter end, and a member of the Client Services Team or Administration Team electronically signs the workflow system to evidence the monitoring performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For select plans and quarters, re-performed the control procedure by comparing the dates and determined that reports and statements were sent to the plan sponsor and/or participant within 20 business days of quarter end.</p> <p>For a selection of plans and quarters, inspected the workflow system and determined that a member of the Client Services Team electronically signed the workflow system providing evidence of the control procedure performed.</p>	No exceptions noted.

Control Objective 10: Relius Software Maintenance		
<i>Controls provide reasonable assurance that Relius software and related database changes relevant to user entities' internal control over financial reporting are approved prior to implementation into the Ingham production environment.</i>		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>10.1 The respective department head approves the minor and major software change that may include any related database changes after testing, as applicable, to be implemented into the production environment via the change control form and implementation dates are captured in the form.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For both software changes that may include any related database changes implemented into the production environment during the SOC examination period, inspected the change control form and determined that the department head signed the form and the implementation date was captured in the form providing evidence of the control procedure performed.</p>	<p>No exceptions noted.</p>
<p>10.2 Access to implement the software changes into the production environment is restricted to authorized and appropriate personnel.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the administrator user list and organization chart; reviewed the list with Ingham personnel; and determined that access to implement the software changes into the production environment is restricted to authorized and appropriate personnel.</p>	<p>No exceptions noted.</p>

Control Objective 11: Internet Data Authenticity		
Controls provide reasonable assurance that connections to https://www.ingham.com and https://accounts.ingham.com websites are configured to protect data relevant to user entities' internal control over financial reporting from unauthorized access.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>11.1 The https://www.ingham.com and https://accounts.ingham.com websites transmit data utilizing HTTPS with TLS encryption which enables 256-bit and 128-bit encryption, respectively, when communicating with Internet browsers.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the https://www.ingham.com and https://accounts.ingham.com websites and determined that TLS encryption with 256-bit encryption are enabled.</p>	No exceptions noted.
<p>11.2 Ingham uses a trusted certificate authority, Network Solution L.L.C. for the https://www.ingham.com and https://accounts.ingham.com websites to inform users that website is authentic.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the https://www.ingham.com and https://accounts.ingham.com websites and determined that valid certificates were issued to Ingham by Network Solutions L.L.C.</p>	No exceptions noted.
<p>11.3 In order for user entities (plan sponsors) and participants to gain access to their accounts via the website, they are required to use a user ID and password.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected logon prompt for the https://accounts.ingham.com website and determined that a user ID and password are required for access.</p>	No exceptions noted.
<p>11.4 Password security parameters for the https://accounts.ingham.com website include the following requirements:</p> <ul style="list-style-type: none"> • Change initial password upon first logon • Account lockout after a set number of unsuccessful logon attempts 	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the password configuration for the https://accounts.ingham.com website and determined that the parameters are applied for the described areas.</p>	No exceptions noted.

Control Objective 12: Logical Security		
Controls provide reasonable assurance that logical access to the network, Relius, and Relius database relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate users and such users are restricted to performing authorized and appropriate actions.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>12.1 Administrator access to the network and Relius are restricted to authorized personnel.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the network administrator user list and organization chart; reviewed the list with Ingham personnel to determine whether administrator access to the network is restricted to authorized personnel.</p> <p>Inspected the Relius user list and organization chart and reviewed the list with Ingham personnel to determine whether administrator access to Relius is restricted to authorized personnel.</p>	<p>Exception noted.</p> <p>Three IT personnel have access to the generic network administrator user account and four personnel have access to the Relius administrator user account. BDO could not determine other than by inquiry that no other personnel are provided with the password to these administrator user accounts.</p>
<p>12.2 To authorize network, Relius, and Relius database access, the employees' department head or their superior completes and signs the Ingham Group Information Technology Staffing Requisition a form. When network access is provided, remote access is also provided.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of employees requiring network and Relius access, inspected the form and determined that the employees' department head or their superior signed the form providing evidence of the control procedure performed.</p> <p>Inquired of the IT Manager and corroborated with the Network Administrator and determined that there were no new users that received Relius database access during the SOC examination period.</p>	<p>No exceptions noted.</p> <p>The operating effectiveness of the control related to authorizing Relius database access could not be tested other than by inquiry as there were no new Relius database access authorization required during the SOC examination period.</p>

Control Objective 12: Logical Security		
Controls provide reasonable assurance that logical access to the network, Relius, and Relius database relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate users and such users are restricted to performing authorized and appropriate actions.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>12.3 To delete network, Relius, and Relius database access, the employees' department head or their superior completes and signs a form. The IT Manager or Network Administrator deletes the network access, and the Relius Administrator deletes the Relius access and Relius database, as applicable, and signs the form to confirm that the access was deleted. When network access is deleted, remote access is also deleted.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of terminated employees requiring network and/or Relius access to be deleted, inspected the form and determined the IT Manager or Network Administrator signed the form providing evidence of the control procedure performed.</p> <p>For a selection of terminated employees, inspected the network and Relius user lists and determined that the terminated employees were not listed.</p> <p>Inquired of the IT Manager and corroborated with the Network Administrator and determined that there were no new users that required Relius database access to be deleted during the SOC examination period.</p>	<p>No exceptions noted.</p> <p>The operating effectiveness of the control related to deletion of Relius database access could not be tested other than by inquiry as there were no users that required Relius database access to be deleted during the SOC examination period.</p>
<p>12.4 Access to the network requires the user to enter a unique user ID and password.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Observed the network logon prompt and determined that a user ID and password are required for access.</p>	<p>No exceptions noted.</p>
<p>12.5 Password security parameters for the network include the following requirements:</p> <ul style="list-style-type: none"> • Minimum password length • Password complexity - enabled • Maximum password age • Password history • Account lockout after a set number of unsuccessful logon attempts 	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the network password configuration and determined that the parameters are applied for the described areas.</p>	<p>No exceptions noted.</p>

Control Objective 12: Logical Security		
Controls provide reasonable assurance that logical access to the network, Relius, and Relius database relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate users and such users are restricted to performing authorized and appropriate actions.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
12.6 Access to Relius requires the user to enter a unique user ID and password.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the Relius logon prompt and determined that a user ID and password are required for access.	No exceptions noted.
12.7 Relius menu and transaction restrictions have been implemented.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the Relius security access rights and determined that menu and transaction restrictions have been implemented.	No exceptions noted.
12.8 Password security parameters for Relius include the following requirements: <ul style="list-style-type: none"> • Minimum password length • Minimum characters in the password • Maximum password age 	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the Relius password configuration and determined that the parameters are applied for the described areas.	No exceptions noted.
12.9 System accounts within the Relius database are used by the IT Manager or Network Administrators to access the Oracle database (the Relius database).	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the Relius database user list and determined that system accounts within the Relius database are used for Oracle access.	No exceptions noted.

Control Objective 12: Logical Security		
Controls provide reasonable assurance that logical access to the network, Relius, and Relius database relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate users and such users are restricted to performing authorized and appropriate actions.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>12.10 Administrator access to the Relius database requires a unique user ID and password and is restricted to authorized personnel.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Observed the Relius database login prompt and determined a user ID and password are required to access the database.</p> <p>Inspected the Relius database user list to determine whether administrator access to the database is restricted to authorized personnel.</p>	<p>Exception noted.</p> <p>Three IT personnel have access to two generic Oracle administrator user accounts. BDO could not determine other than by inquiry that no other personnel are provided with the password to these administrator user accounts.</p>

Control Objective 13: Network Security		
Controls provide reasonable assurance that connections to the Internet are configured to protect data relevant to user entities' internal control over financial reporting from unauthorized access.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
13.1 An industry standard firewall resides on the production environment at ColoHouse.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the network diagram and determined that a firewall was installed on the production environment.	No exceptions noted.
13.2 The firewall on the production environment that resides at ColoHouse provides a log of events and activities that are reviewed by the Network Administrator daily. The reviewer notates the log to evidence the review performed.	Inquired of Ingham personnel and corroborated the control procedure described. For a selection of dates, inspected the log and determined that the Network Administrator notated the log providing evidence of the control procedure performed.	No exceptions noted.
13.3 Beginning April 27, 2019, Ingham IT investigates any serious incident and resolves those serious incidents in coordination with SECNAP that are tracked via a ticket system.	Inquired of Ingham personnel and corroborated the control procedure described. For a selection of serious incidents beginning April 27, 2019, inspected the ticket and determined that the incident was investigated and resolved.	No exceptions noted.
13.4 Ingham utilizes VPN technology to restrict remote access to the network.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the VPN technology configuration and determined that Ingham utilizes VPN technology to restrict remote access to the network.	No exceptions noted.
13.5 Access to the VPN requires the user to enter a unique user ID and password.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the VPN logon prompt and determined that a user ID and password are required for access.	No exceptions noted.

Control Objective 13: Network Security		
Controls provide reasonable assurance that connections to the Internet are configured to protect data relevant to user entities' internal control over financial reporting from unauthorized access.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
13.6 The VPN is configured to require users to connect to the Cisco AnyConnect VPN which establishes an SSL tunnel that utilizes RSA-2048 bits encryption.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the VPN technology configurations and determined that the VPN connection establishes an SSL tunnel that utilizes RSA-2048 bits encryption.	No exceptions noted.
13.7 Antivirus software is installed to protect the servers and workstations from malicious code or viruses.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the antivirus software on a selected server and a workstation and determined that the antivirus software was installed.	No exceptions noted.
13.8 Virus signature definition files are configured to automatically update daily for servers and workstations.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the virus signature definition file configurations and determined that the files are configured to automatically update daily for servers and workstations.	No exceptions noted.
13.9 Virus scans are configured to run daily for servers and workstations.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the virus scan settings and determined that scans are configured to run daily for servers and workstations.	No exceptions noted.

Control Objective 14: Physical Security		
Controls provide reasonable assurance that physical access to the office, corporate office server room, and ColoHouse colocation facility housing computers and other resources relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate personnel.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
14.1 During business hours, Monday through Thursday, 8:30 AM to 5:00 PM and Friday, 8:30 AM to 4:00 PM ET, a receptionist is stationed in the lobby to monitor visitors.	Inquired of Ingham personnel and corroborated the control procedure described. Observed the receptionist stationed in the lobby monitoring visitors during business hours.	No exceptions noted.
14.2 Visitors must check in with the receptionist, sign the Visitor Log, and are provided with a visitor badge.	Inquired of Ingham personnel and corroborated the control procedure described. Observed that visitors must check in with the receptionist, sign the Visitor Log, and are provided with a visitor badge.	No exceptions noted.
14.3 Visitors are met by an Ingham employee and escorted within the office.	Inquired of Ingham personnel and corroborated the control procedure described. Observed that visitors are met by an Ingham employee and escorted within the office.	No exceptions noted.
14.4 Office access during non-business hours requires the use of a key fob.	Inquired of Ingham personnel and corroborated the control procedure described. Observed that the office access during non-business hours requires the use of a key fob.	No exceptions noted.
14.5 Corporate office server room access also requires the use of a separate key fob.	Inquired of Ingham personnel and corroborated the control procedure described. Observed that the corporate office server room access requires the use a fob. Observed that permission to the corporate office server room is granted through the server room access software.	No exceptions noted.

Control Objective 14: Physical Security		
Controls provide reasonable assurance that physical access to the office, corporate office server room, and ColoHouse colocation facility housing computers and other resources relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate personnel.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
14.6 Access to the corporate office server room is restricted to IT personnel.	Inquired of Ingham personnel and corroborated the control procedure described. Inspected the corporate office server room access list and organization chart; reviewed the list with Ingham personnel; and determined that access to the corporate office server room is restricted to IT personnel.	No exceptions noted.
14.7 To authorize office, corporate office server room, and ColoHouse colocation facility access, the respective department head or their superior completes and signs a form.	Inquired of Ingham personnel and corroborated the control procedure described. For a selection of new hires requiring office access, inspected the form and determined that the respective department head or their superior signed or approved the form providing evidence of the control procedure performed. Inquired of the IT Manager and corroborated with the Information Security Officer and determined that there were no new users that received corporate office server room or ColoHouse colocation facility access during the SOC examination period.	No exceptions noted. The operating effectiveness of the control related to authorizing corporate office server room or ColoHouse colocation facility access could not be tested other than by inquiry as there were no new corporate office server room or ColoHouse colocation facility access authorization required during the SOC examination period.

Control Objective 14: Physical Security		
Controls provide reasonable assurance that physical access to the office, corporate office server room, and ColoHouse colocation facility housing computers and other resources relevant to user entities' internal control over financial reporting is restricted to authorized and appropriate personnel.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>14.8 To delete office, corporate office server room, and ColoHouse colocation facility access, the respective department head or their superior collects the office and corporate office server room key fobs or contacts ColoHouse to delete access to the colocation facility, as applicable. The fobs are disabled as part of the user access deletion as evidenced on the Fob Log. The respective department head or their superior signs a form to evidence that the fobs were collected and disabled or confirmation that ColoHouse deleted access to the colocation facility.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of terminated employees requiring office access to be deleted, inspected the form and determined that the respective department head or their superior signed the form providing evidence of the control procedure performed.</p> <p>Inspected the office key fob list and determined that the terminated employees were not listed.</p> <p>Inquired of the IT Manager and corroborated with the Information Security Officer and determined that there were no new users that required corporate office server room or ColoHouse colocation facility access to be deleted during the SOC examination period.</p>	<p>No exceptions noted.</p> <p>The operating effectiveness of the control related to deletion of corporate office server room or ColoHouse colocation facility access could not be tested other than by inquiry as there were no users that required corporate office server room or ColoHouse colocation facility access to be deleted during the SOC examination period.</p>
<p>14.9 The building employs a CCTV system to record activities at both the exterior and the interior of the building.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Observed the CCTV and determined that the CCTV records activities at both the exterior and interior of the building.</p>	<p>No exceptions noted.</p>
<p>14.10 Building security personnel monitor the CCTV 24/7.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Observed the building security personnel monitoring the CCTV.</p>	<p>No exceptions noted.</p>

Control Objective 15: Data Backup		
Controls provide reasonable assurance that data relevant to user entities' internal control over financial reporting is backed up at appropriate intervals and are stored offsite.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
<p>15.1 Backups are performed utilizing Veritas Backup Exec to LTO tapes that are identified with a unique tracking number.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the Veritas Backup Exec version and determined that backups are performed utilizing Veritas Backup Exec.</p> <p>Observed the backup tapes and determined that the LTO tapes are identified with a unique tracking number.</p>	<p>No exceptions noted.</p>
<p>15.2 Backups are performed according to the following schedule:</p> <ul style="list-style-type: none"> • Daily differential backups - Daily • Full backups - Daily • Relius transactional logs are backed up every two hours (6 times a day) 	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Inspected the backup schedule configuration and determined that the schedule has been established and operating as described.</p>	<p>No exceptions noted.</p>
<p>15.3 The IT Manager or Network Administrator reviews the success or failure of the backup jobs daily and notates Daily IT Infrastructure Health-Check Report to evidence the review performed. Failed backups are investigated and resolved, if necessary and the Network Administrator notates the Daily IT Infrastructure Health-Check Report to evidence the review performed.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>For a selection of dates, inspected the Daily IT Infrastructure Health-Check Report and determined that the Network Administrator notated the report providing evidence of the control procedure performed.</p> <p>Inquired of the IT Manager and corroborated with the Network Administrator and determined that there were no failed backups during the SOC examination period.</p>	<p>No exceptions noted.</p> <p>The operating effectiveness of the control related to the investigation of failed backups could not be tested other than by inquiry as there were no failed backups during the SOC examination period.</p>
<p>15.4 Backup tapes from ColoHouse are stored in a fire resistant safe in the corporate office server room.</p>	<p>Inquired of Ingham personnel and corroborated the control procedure described.</p> <p>Observed the fire resistant safe in the corporate office server room and determined that the backup tapes are stored in the safe.</p>	<p>No exceptions noted.</p>

Control Objective 15: Data Backup		
Controls provide reasonable assurance that data relevant to user entities' internal control over financial reporting is backed up at appropriate intervals and are stored offsite.		
<i>Controls Specified by Ingham</i>	<i>Tests of Controls Performed by BDO USA, LLP</i>	<i>Results of Tests</i>
15.5 The IT Manager or Network Administrator performs restores based on user requests and sends an email to the user to confirm that the restore was performed successfully.	Inquired of Ingham personnel and corroborated the control procedure described. Inquired of the IT Manager and corroborated with the Network Administrator and determined that both restorations during the SOC examination period was not available.	Exception noted. For both restorations performed during the SOC examination period, evidence of restoration was not available.

V. OTHER INFORMATION PROVIDED BY THE SERVICE ORGANIZATION

Other Information Provided by the Service Organization

Disaster Recovery and Continuity Planning

Ingham's disaster recovery and continuity planning philosophies emphasize disaster prevention, mitigation, and recovery. The work environment is regularly reviewed to identify potential sources of risk and Ingham continually strives to reduce potential single points of failure. Technology personnel also evaluate the environment whenever new services or changes are introduced.

Ingham has a formal Disaster Recovery Plan that addresses the Ingham network technology systems. The plan is designed to protect Ingham's personnel and data, user entity's data, and to provide clarification of emergency response duties. Processes and procedures have been communicated to executive level management to mitigate the impact of most disasters and/or business interruptions.

Ingham's core systems are housed in a hurricane cat 5 proof building at ColoHouse. In addition, data is backed up to tape. Ingham has cross trained its employees to facilitate a faster recovery time.

Ingham's servers and databases are hosted at ColoHouse which follows high availability features:

- This building is also outside the FEMA 500 year flood zone (Flood Zone X), Seismic Zone 0, outside of the Miami-Dade evacuation zone, located on the same dual power sub stations that service local hospitals, federal and state courthouses, which equates to priority turn-up for this facility
- SSAE 18 Certified Data Center.
- SOC 2 Compliant.
- PCI DSS Compliant.
- HIPAA, SOX, GLBA and Fed Banking regulations Compliant.
- N+1 Technology (redundancies).
- UPS Batteries (redundancies).
- Branch breaker monitoring.
- True Carrier Neutral - on-net access to more than 20 tier-1 and tier-2 carriers.
- FL-IX - Peering Exchange connectivity to Florida Internet Exchange.
- Subfloor cross connects - fiber, cooper & coaxial.
- Dual Generators (21 days guaranteed - 6 ½ capacity will run without refueling) - additional roll-up generator can also be integrated with existing parallel equipment.
- As an added precaution, Digital Realty Trust has 24-hour emergency fuel policy.
- Two separated fuel tanks located in geographically diverse regions.
- Redundant power feeds.
- 70 feet above sea level.
- 100% Uptime Power.

- 100% Uptime Environment Controls.
- TotalPac - dual alarmed dry-pipe fire suppression system - multi-zone pre-action.
- Open 24/7 with certified engineering staff (for preparation and during any storm related complications)
- 24/7 on-site security officers.
- CCTV surveillance, with digital storage - perimeter and interior.
- Key card access & biometric fingerprint scanners - multiple layers

Ingham's hot site maintains the following systems:

- Application servers
- Database servers
- Workstations
- Printers
- Telecommunication systems (fax, phones, data access)
- Emergency power supply

Protection strategy of vital records and resources includes:

- Using offsite storage for electronic and paper documents
- Backing up mission critical data
- Specialized insurance protection