

Participant Disclosure

ERISA §404(a)(5) compliance document – 3/20/2017

Medlinks Cost Containment, Inc. 401(k) Profit Sharing Plan

This disclosure is meant to help plan participants make informed savings and investment decisions.

This disclosure is for distribution to:

- All eligible plan participants, not just those with account balances
- New hires who become eligible after this initial release August 30, 2012

The content of this disclosure is focused on:

- Plan expense information that may affect any plan participant
- Information about self-directed brokerage accounts under our plan

This disclosure does not address pooled investments or investments other than “listed” assets under the self-directed brokerage account for each participant FBO account. These “listed” assets may include mutual funds, stocks, bonds and other equity investments. The information about self-directed brokerage accounts applies only to the contribution accounts that permit participant-directed investments.

Preliminary information

What is the purpose of this ERISA §404(a)(5) disclosure? The Department of Labor believes that, as a participant in our Employer-sponsored retirement plan, you will make better choices for your retirement savings and investments if we provide you with the following:

- General information about the plan parameters for investing;
- The potential administrative expenses that may be charged against plan accounts;
- The potential individual expenses that may be charged against your plan accounts;
- Understanding investment objectives and terminology;
- A statement about fees and investment expense information; and
- A Comparative Chart for designated investment alternatives (*not applicable*).

Who should receive this disclosure? This disclosure is being provided to each employee who has satisfied the plan eligibility requirements and reached an entry date to be eligible to participate in the company's 401(k) Plan.

Contact persons and account access information:

Individually Managed Accounts provided by:

See Appendix A, attached to this disclosure

The toll-free number is:

See Appendix A, attached to this disclosure

Supplemental resources for more details about plan fees and expenses:

Participant-level fees charged by our Third-Party Administration Firm	If these fees are charged against individual participant accounts, estimated fee dollar amounts can be looked up in the Summary Plan Description
Participant-level fees charged by our Financial Service Company	There may be transaction fees charged against your account, primarily for purchasing or selling an investment

General information about the plan parameters for investing

- 1. Explanation of circumstances under which plan participants may give investment instructions:** Investment instructions may be given under a number of different circumstances.

Investment instructions may generally be made on a paper form or by accessing your personal investment account online.

First, at the time of plan enrollment when a 401(k) payroll withholding election may be made to start personal savings in a 401(k) Plan, you can make your decisions for your retirement plan investment portfolio.

After the point of your initial enrollment, you may want to periodically re-balance your investments in accordance with a specific allocation ratio (between the different fund selections you have made). Rebalancing is often done after consulting with a designated investment advisor. Or, in some cases, you may be able to rebalance your plan investments by accessing your personal investment account online.

2. Explanation of any limits on investment trading instructions under the plan: The plan may impose reasonable restrictions on the frequency with which plan participants may give investment instructions. However, all plan participants must be allowed to give investment instructions at least once a quarter.

3. Designated Investment Alternatives – information regarding the exercise of voting or other rights pertinent to investment in each designated investment alternative, and any restrictions on such rights:

***Not Applicable** – Our plan’s investment platform is structured to permit individually managed, directed brokerage accounts for each plan participant. By making these directed brokerage accounts available, our plan fiduciaries want you to have a wide array of investment options to select from. Therefore, our plan fiduciaries did not choose designated investment alternatives to limit your investment options under the plan*

4. Designated Investment Alternatives – Identification of each designated investment alternative selected by plan fiduciaries.

***Not Applicable** – Our plan’s investment platform is structured to permit individually managed, directed brokerage accounts for each plan participant. By making these directed brokerage accounts available, our plan fiduciaries want you to have a wide array of investment options to select from. Therefore, our plan fiduciaries did not choose designated investment alternatives to limit your investment options under the plan.*

5. Description of arrangements for individually managed, directed brokerage accounts or brokerage window accounts:

a. How does this arrangement work? Directed brokerage accounts offer a broad range of investment choices for participant direction of investments. This investment strategy is often chosen by employers with a more highly paid and/or professional-level work force, with the idea that these employees are more apt to understand the detailed factors that go into the selection of an investment portfolio.

The biggest advantage with these directed brokerage accounts is that the plan fiduciaries do not limit the individual participant’s investment choices to a narrow menu of mutual funds. In addition, the modernized trading and valuation process for investments made through directed brokerage accounts is based on daily valuation methodology so that you may access your personal investment account online to evaluate the status of investments and request changes, at any time.

The investment values provided through this online access to the directed brokerage accounts are the total value, including all money sources and account types maintained in an FBO (for the benefit of) account, under each participant's name.

b. How and to whom do you give any investment trading instructions?

Investment trading instructions may be handled on the financial service company's website, by accessing your personally managed, directed brokerage account online. Alternatively, investment-trading transactions can often be handled by calling an 800 number. If you need help to understand how investment-trading works, a plan trustee may be able to help you with the investment trading process or the trustee may refer you to another advisor who will be able to help you.

Participant direction must be followed by the Plan Trustee(s), any designated **ERISA section 3(38) investment manager**, and/or the financial service company and its agents. However, these authorized parties may decline to follow a Participant's investment direction (when it would be imprudent to do so), to the extent such direction would:

- Cause the assets of the plan to be maintained outside the jurisdiction of the U.S. courts;
- Cause the assets to be invested in collectibles within the meaning of Code Section 408(m), invoking taxable consequences to the individual plan participants, subject to the rules for the 10% penalty tax on early distributions prior to age 59-1/2;
- Result in a prohibited transaction;
- Generate unrelated business taxable income (i.e., limited partnerships invested in active businesses, rather than generating passive income); or
- Jeopardizes the plan's tax qualification;
- Be contrary to the Plan's governing documents;
- Cause the assets to be invested in other illiquid assets such as real estate or property;
- Result (or could result) in a loss exceeding the value of the Participant's Account, meaning it is not advisable to make trades through margin accounts.

c. Are there restrictions or limitations on trading? Following the mutual fund trading scandals that took place in 2003 and 2004, mutual fund companies took action to prevent short-term in and out trading, otherwise known as market timing. To counter this, many mutual funds established trading restrictions designed to reduce trading activities in their funds. This means that the financial service company may impose reasonable restrictions on the frequency with which plan participants may give investment restrictions and/or redemption fees of up to 2% may be charged when certain funds are cashed out or redeemed.

d. Who do you contact if you have questions about your individually managed account? You may call the toll-free number referenced on Appendix A.

Potential administrative expenses that may be charged against plan accounts

The Employer can decide to charge fees and expenses to the individual accounts of plan participants, when the Employer receives an invoice covering direct fees and expenses for general plan services (e.g., legal, accounting, recordkeeping, and compliance services).

This Employer decision about how to handle fee payments for general plan services and whether to charge the individual accounts of plan participants for these fees is not a one-time decision. Rather, the Employer makes a new decision each time an invoice is received with respect to our retirement plan services.

What are the options the Employer has when the decision is being made about how to handle fee payments for general plan services? See preferred options that are checked.

- The Employer can choose to handle fee payments for general plan services by paying these fees from company assets, as a general business expense. *When this option is selected, your individual account will not be charged.*
- The Employer can choose to handle fee payments for general plan services by using some or all of the non-vested forfeiture amounts from terminated employees' accounts to cover direct fees and expenses for general plan services. *When this option is selected, your individual account will not be charged.*
- The Employer can choose to handle fee payments for general plan services by charging these fees to the individual accounts of plan participants. *This option may be the preferred option, if checked. If not checked, this is an alternative option that the Employer may use from time to time. When this option is utilized for a particular billing period, the basis on which such charges will be allocated to, or affect the balance of, each individual account is based one of the following methods, with pro-rata being the most traditional approach:*
 - Pro rata, based on the ratio of each participant's individual account balance(s) to the total account balances of all participants in the plan. *This method is designed to have individuals with larger account balances pay a greater share of the fees and expenses for general plan services.*

Example: If there was an invoice for general plan services that showed \$2,000 was due for annual plan services and the total account balances of all participants in the plan was \$200,000, then an individual with accounts totaling \$5,000 would pay 2.5% or \$50 of the \$2,000 expense; while an individual with accounts totaling \$40,000 would pay 20.0% or \$400 of the \$2,000 expense.
 - Per capita, based on the total amount of fees due, divided by the number of participants with account balances. *This method is designed to have each individual pay the same dollar amount of the fees and expenses for general plan services*

Example: If there was an invoice for general plan services that showed \$2,000 was due for annual plan services and there were 20 employees with account balances in the plan, a per-capita allocation of the \$2,000 expense would result in a uniform charge to each individual participant's account(s) equal to \$2,000 divided by 20 = \$100 per participant.

Note: Some of the plan's administrative expenses are paid out of revenues generated from the plan's investment alternatives, rather than through direct charges against plan accounts.

Potential individual expenses that may be charged against your plan accounts

According to the Department of Labor, participant-level fees and expenses may be charged against the individual account(s) of the participant, rather than charging such expenses on a plan-wide basis. *

The participant-level expenses that may be passed through for payment from the account(s) of plan participants include the following:

- Lump sum distributions following termination of employment
- Participant loan initiation and loan maintenance
- Incoming Rollover processing
- QDRO processing, for distributions due to divorce settlements/child support
- Hardship distribution processing
- In-Service distribution processing
- RMD processing for required minimum distributions beginning after participant attains Age 70½
- Benefit calculation charges
- Account maintenance charges for when a participant postpones benefit distribution after termination of employment
- Automatic IRA rollover setup for mandatory distributions
- Locator service for terminated participants with erroneous address information
- Investment advisory services
- Brokerage account set-up and/or maintenance charges
- Front- or back-end loads or sales charges associated with a particular mutual fund
- Fund redemption fees or transfer fees
- Optional rider charges in annuity contracts

* **Notice:** If you want to know whether the Employer has a policy in place to charge some or all of these participant-level expenses against the individual's account balance(s), you may refer to the Summary Plan Description that is available from your Employer. Also, this Plan Policy provides estimated dollar amounts so that you can review the costs involved in anticipation of an event that could generate a participant-level expense.

Understanding investment objectives and terminology

Understanding Investment Objectives, Investing and Diversification. The Pension Protection Act of 2006 required The Department of Labor (DOL) to provide plan participants with sources of information for investing and diversification. Here is a web link to the information that can be found on the DOL website @ dol.gov:

<http://www.dol.gov/ebsa/investing.html>

Understanding Investment Terminology, a Glossary of Investment-Related Terms

There are many resources available on the Internet for a general glossary of investment terms, to assist you in understanding the terms found in investment reports or investment articles that you may be reading. We are making available a Sample Glossary of Investment-Related Terms that was prepared by the SPARK institute and ICI. You may go to this web link to obtain that document:

http://www.ici.org/401k/11_401k_glos

Certain mutual funds may charge extra fees

For example:

- Redemption fees may be charged, at the point of selling a mutual fund, based on up to 2% of the sales price (when applicable)
- Back-end loads may be charged at the point of selling a mutual fund, based on charges ranging from 5% to 6% of the sales price (when applicable)
- Front-end loads may be charged at the point of purchase, based on legal limits set by NASD rules at 8-1/2% of the purchase price OR by the Investment Company Act of 1940 at 9% of the purchase price (when applicable)

When reviewing the individual mutual fund prospectuses to make your investment decisions or calling the 800 number of the financial institution for fund information, it is especially important to watch for whether any of these special charges apply to your fund choices.

For more details about mutual fund expenses, you may want to review the following links:

http://en.wikipedia.org/wiki/Mutual_fund_fees_and_expenses#Back-end_load

<http://www.sec.gov/answers/mffees.htm>

Statement about fees and investment expenses information

The specific amount of certain fees associated with the purchase or sale of a security through each individually managed, brokerage account or brokerage window, may not be known by the Employer or the financial service company (in advance of an electronic transaction being made).

With such a broad set of fund choices being available through each individually managed, directed brokerage account or brokerage window, the idea of compiling and providing you with a list of all investment choices made by employees participating in the plan and showing the potential investment expenses for each particular investment was not viable – especially when consideration was given to the possibility that individual plan participants could become more overwhelmed in trying to sort through a long list of investment expense data when making investment decisions.

It is advisable that you contact the financial service company before purchasing or selling any security, to ask about any fees or investment expenses, including any undisclosed fees,

associated with the purchase or sale of a particular security. The toll-free number for the financial service company is referenced on Appendix A.

You should also be aware that you can access fund fact sheets and prospectuses by going to your personal investment account online.

Comparative chart for designated investment alternatives

Not Applicable. Our plan's investment platform is structured to permit individually managed, directed brokerage accounts for each plan participant. By making these directed brokerage accounts available, our plan fiduciaries want you to have a wide array of investment options to select from. Therefore, our plan fiduciaries did not choose designated investment alternatives to limit your investment options under the plan.

Hybrid Arrangements with directed brokerage accounts and pooled, trustee-managed investments. In some retirement plans, there may be directed brokerage accounts set up in addition to there being pooled, trustee-managed investments. This disclosure is only meant to address the portion of the plan involving participant directed accounts.

APPENDIX A

Contact persons and account access information

Individually Managed Accounts provided by:
TradePMR

Plan's Investment Advisor:
Mike Ching at Nardene Wealth Management Inc.
1-925-588-9397

The toll-free number is:
1-888-723-3767

The website URL:
www.tradepmr.com