

*MMA Trust Company*

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*Form ADV - Part II*

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*Uniform Application for  
Investment Advisor Registration*

*January 1, 2010*



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*Stewardship Solutions*

Mennonite Mutual Aid  
1110 North Main Street  
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## Uniform Application for Investment Adviser Registration

### OMB APPROVAL

OMB Number: 3235-0049  
Expires: February 28, 2011  
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hours per response: . . . . 4.07

Name of Investment Adviser:

**MMA Trust Company**

Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code	Telephone Number
<b>1110 North Main Street</b>	<b>Goshen</b>	<b>IN</b>	<b>46528</b>	<b>(574 )</b>	<b>533-9511</b>

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.**

### Table of Contents

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
1	Advisory Services and Fees . . . . .	2
2	Types of Clients . . . . .	2
3	Types of Investments . . . . .	3
4	Methods of Analysis, Sources of Information and Investment Strategies . . . . .	3
5	Education and Business Standards . . . . .	4
6	Education and Business Background . . . . .	4
7	Other Business Activities . . . . .	4
8	Other Financial Industry Activities or Affiliations . . . . .	4
9	Participation or Interest in Client Transactions . . . . .	5
10	Conditions for Managing Accounts . . . . .	5
11	Review of Accounts . . . . .	5
12	Investment or Brokerage Discretion . . . . .	6
13	Additional Compensation . . . . .	6
14	Balance Sheet . . . . .	6
	Continuation Sheet . . . . .	Schedule F
	Balance Sheet, if required . . . . .	Schedule G

(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

**1. A. Advisory Services and Fees.** (check the applicable boxes)For each type of service provided, state the approximate  
% of total advisory billings from that service.

(See instruction below.)

**Applicant:**

- |                                     |     |   |           |   |
|-------------------------------------|-----|---|-----------|---|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services .....  | <u>99</u> | % |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services .....  | <u>1</u>  | % |
| <input type="checkbox"/>            | (3) | Furnishes investment advice through consultations not included in either service described above .....  | _____     | % |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription .....   | _____     | % |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above .....   | _____     | % |
| <input type="checkbox"/>            | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities ..... | _____     | % |
| <input type="checkbox"/>            | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities .....   | _____     | % |
| <input type="checkbox"/>            | (8) | Provides a timing service .....   | _____     | % |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above .....   | _____     | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- |    |   |  |
|----|---|--|
| B. | Does applicant call any of the services it checked above financial planning or some similar term? ..... | Yes No   |
|    |   | <input checked="" type="checkbox"/> <input type="checkbox"/> |

**C.** Applicant offers investment advisory services for: (check all that apply)

- |                                     |     |  |                          |     |                   |
|-------------------------------------|-----|--|--------------------------|-----|-------------------|
| <input checked="" type="checkbox"/> | (1) | A percentage of assets under management      | <input type="checkbox"/> | (4) | Subscription fees |
| <input checked="" type="checkbox"/> | (2) | Hourly charges                               | <input type="checkbox"/> | (5) | Commissions       |
| <input checked="" type="checkbox"/> | (3) | Fixed fees (not including subscription fees) | <input type="checkbox"/> | (6) | Other             |

**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of Clients** — Applicant generally provides investment advice to: (check those that apply)

- |                                     |    |                                  |                                     |    |   |
|-------------------------------------|----|----------------------------------|-------------------------------------|----|---|
| <input checked="" type="checkbox"/> | A. | Individuals                      | <input checked="" type="checkbox"/> | E. | Trusts, estates, or charitable organizations                    |
| <input type="checkbox"/>            | B. | Banks or thrift institutions     | <input checked="" type="checkbox"/> | F. | Corporations or business entities other than those listed above |
| <input type="checkbox"/>            | C. | Investment companies             | <input checked="" type="checkbox"/> | G. | Other (describe on Schedule F)                                  |
| <input checked="" type="checkbox"/> | D. | Pension and profit sharing plans |                                     |    |   |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |  |
|--|--|
| <p>A. Equity securities</p> <p><input checked="" type="checkbox"/> (1) exchange-listed securities</p> <p><input checked="" type="checkbox"/> (2) securities traded over-the-counter</p> <p><input type="checkbox"/> (3) foreign issuers</p> <p><input type="checkbox"/> B. Warrants</p> <p><input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper)</p> <p><input type="checkbox"/> D. Commercial paper</p> <p><input checked="" type="checkbox"/> E. Certificates of deposit</p> <p><input checked="" type="checkbox"/> F. Municipal securities</p> <p>G. Investment company securities:</p> <p><input checked="" type="checkbox"/> (1) variable life insurance</p> <p><input checked="" type="checkbox"/> (2) variable annuities</p> <p><input checked="" type="checkbox"/> (3) mutual fund shares</p> | <p><input checked="" type="checkbox"/> H. United States government securities</p> <p>I. Options contracts on:</p> <p><input type="checkbox"/> (1) securities</p> <p><input type="checkbox"/> (2) commodities</p> <p>J. Futures contracts on:</p> <p><input type="checkbox"/> (1) tangibles</p> <p><input type="checkbox"/> (2) intangibles</p> <p>K. Interests in partnerships investing in:</p> <p><input checked="" type="checkbox"/> (1) real estate</p> <p><input type="checkbox"/> (2) oil and gas interests</p> <p><input checked="" type="checkbox"/> (3) other (explain on Schedule F)</p> <p><input checked="" type="checkbox"/> L. Other (explain on Schedule F)</p> |
|--|--|

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |  |

B. The main sources of information applicant uses include: (check those that apply)

- |   |   |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services  |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities   | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases  |
| (4) <input checked="" type="checkbox"/> Corporate rating services             | (8) <input type="checkbox"/> Other (explain on Schedule F)  |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |   |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions  |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered options, or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)  |
| (4) <input type="checkbox"/> Short sales   |   |

**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ..... Yes No  
☒ ☐

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input checked="" type="checkbox"/> (1) broker-dealer  | <input type="checkbox"/> (7) accounting firm                                       |
| <input checked="" type="checkbox"/> (2) investment company   | <input type="checkbox"/> (8) law firm  |
| <input checked="" type="checkbox"/> (3) other investment adviser   | <input checked="" type="checkbox"/> (9) insurance company or agency                |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? ..... Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

Applicant:

**MMA Trust Company**

SEC File Number:

801- **60293**

Date:

**1/1/2010**

**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? .....

Yes No  
☒ ☐

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Each client account is reviewed at least monthly by an investment manager or an assistant investment manager. Any development of major economic significance to any security held in any account may lead to more frequent reviews. Income, security price, number of shares or dollar amounts of the investment yield are examined as part of account reviews. Each discretionary account is formally reviewed annually by the internal Investment Review Committee.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Clients receive account summary information, security details, security transactions, principal additions and withdrawals, and investment performance reports on at least a calendar quarter basis.

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  | Yes                                 | No                       |
|--|-------------------------------------|--------------------------|
| (1) securities to be bought or sold? .....               | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? ..... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? .....                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? .....                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? .....

Yes No  
☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |   |  |
|---|--|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes No<br><input checked="" type="checkbox"/> <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes No<br><input checked="" type="checkbox"/> <input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- |  |  |
|--|--|
| ● has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or |  |
| ● requires prepayment of more than \$500 in fees per client and 6 or more months in advance  | Yes No   |
| Has applicant provided a Schedule G balance sheet? .....   | <input type="checkbox"/> <input checked="" type="checkbox"/> |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>MMA Trust Company</b>		IRS Empl. Ident. No.: <b>35-2140529</b>
Item of Form (identify)	Answer	
1. A.	<p>MMA Trust Company offers investment advisory services for assets it manages for clients. Ninety-nine percent of MMA Trust Company's advisory fees comes from providing investment supervisory services to its clients and one percent comes from its non-discretionary accounts. Investment advisory services are offered for a percentage of assets under management. MMA Trust Company's maximum fee is an annual service charge of 1.50% of assets, although all fees are negotiable. MMA Trust Company may collect and distribute fees on behalf of independent consultants from its annual service charge described above. This arrangement is disclosed in the fee schedule.</p> <p>At present, \$100,000 is the minimum dollar value of assets for starting an account relationship. Fees are computed monthly and are payable quarterly in arrears of services. Compensation is not payable before services are provided. Clients may terminate an investment advisory contract at any time upon thirty days prior written notice or without penalty within five business days of its execution.</p> <p><b>MMA Trust Company may provide its clients with a variety of mutual funds as investment options. Mutual funds charge fees that are in addition to the fees charged by MMA Trust Company. Such fees typically vary, but generally range from .15% to 1.5%. Frequently, although not always, MMA Trust Company's fees will be reduced when the client elects mutual fund investment options. Such reductions in MMA Trust Company's fees may not offset the fees charged by the mutual fund(s). Accordingly, mutual fund investment options may result in higher total fees. Mutual fund fees will be charged as set forth in the mutual fund prospectus.</b></p>	
2. G.	Types of Clients: MMA Trust Company provides limited investment advisory services to Mennonite Financial Federal Credit Union with respect to health savings accounts offered by the credit union to their customers.	
3. K.	Occasionally MMA Trust Company offers advice with respect to interests in closely held family partnerships.	
3. L.	Other investment types may include mortgage-backed and asset-backed securities.	
5.	General standards of education and business experience MMA Trust Company requires of those involved in giving investment advice include at least a bachelor's level degree in business, accounting or economics, and financial market experience.	
6.	<p>The education and business background of MMA Trust Company personnel is as follows:</p> <p><i>President and CEO</i></p> <ul style="list-style-type: none"> <li>Rodney D. Diller: Born June 6, 1957. A.A. - Hesston College (Kansas); B.A. - Goshen College (Indiana); American Bankers Association's National Trust School and National Graduate Trust School; bank trust and investment manager, 1978-2000; President of MMA Trust Company since 2001.</li> </ul> <p><i>Vice President</i></p> <ul style="list-style-type: none"> <li>William S. Hartman, III: Born April 28, 1960. B.S. - Penn State University; J.D. candidate, Widener University School of Law; 16 years of commercial agricultural lending, tax preparation and business planning with farm credit organization, 1985-1999; charitable gift and estate planning with MMA, 1998-2002; Trust Advisor with MMA Trust Company since 2002; Vice President with MMA Trust Company since 2008.</li> </ul> <p><i>Director of Charitable, Investment, and Trust Administration</i></p> <ul style="list-style-type: none"> <li>Todd A. Holsopple: Born August 8, 1965. B.S. Accounting - Goshen College (Indiana), 1988; 9 years of corporate financial experience, 1992-2001; Foundation Representative with MMA since 2001; Trust Administration with MMA since July 2004.</li> </ul> <p><i>Chief Compliance Officer</i></p> <ul style="list-style-type: none"> <li>Philip R. Zimmerman: Born December 25, 1953. B.S., History - University of Maryland, 1983; Juris Doctorate - Nova University (Florida), 1986; General Counsel since 2000.</li> </ul>	



(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>MMA Trust Company</b>		IRS Empl. Ident. No.: <b>35-2140529</b>
Item of Form (identify)	Answer	
	<p><i>Chief Financial Officer</i></p> <ul style="list-style-type: none"> <li>Melvin L. Claassen: Born October 12, 1954. B.S., Business - Eastern Mennonite College (Virginia), 1977; M.B.A. - University of Nebraska, 1982; Certified Financial Planner since 1995; Project Manager with MMA since 1993; Trust Services Administrator with MMA since 1994; Financial Analyst with MMA since 1998; Chief Financial Officer with MMA since 2002.</li> </ul> <p><i>Trust and Investment Advisors</i></p> <ul style="list-style-type: none"> <li>John R. King: Born October 4, 1952. B.A. - Goshen College (Indiana); M.B.A. - Temple University; post-graduate experience in finance, 1995-1999; Client Services Manager with MMA, 1999-2000; Client Services Manager with MMA Trust Company since 2001.</li> <li>Michael Miller: Born January 12, 1958. B.A., History - Williams College (Massachusetts); Certified Financial Planner; Chartered Financial Consultant; Mennonite Foundation representative since 1991; Trust and Investment Advisor with MMA Trust Company since 2004.</li> <li>Jeffrey Swartzentruber: Born February 15, 1961. B.A., Accounting - Goshen College (Goshen, Indiana), 1983; Certified Public Accountant, 1986; With MMA Trust Company since July 2001.</li> </ul> <p><i>Investment Committee</i></p> <ul style="list-style-type: none"> <li>Arlan Yoder: Born February 15, 1951. B.B.A. - Wichita State University (Kansas); M.B.A. - Fort Hays State University (Hays, Kansas); Chief Financial Officer, Via Christi Health System, 1998-2008; Financial Consultant, 2008-2009; Senior Investment Officer with MMA Trust Company since 2009.</li> <li>Donald Fecher: Born March 3, 1956. B.B.A. - James Madison University, 1978; Self-employed Consultant, 2005-2008; Retirement Plan Specialist with MMA Trust Company since 2008.</li> <li>Jeffrey Godshall: Born May 14, 1963. B.S. - Philadelphia University; Controller, Richard B. Souder Masonry, Inc., 1999-2007; Trust and Investment Advisor with MMA Trust Company since 2007.</li> <li>Dennis LeFevre: Born December 27, 1962. A.A. - Hesston College (Kansas); B.S. - University of Illinois, 1986; Graduate School of Banking (Madison, Wisconsin), 1993-1996; Certified Financial Planner; Mennonite Foundation Western Regional Manager, 1997-2001; MMA Regional Vice President, 2000-2001; Owner and President of Financial Partners, LLC, 2001-2009; Trust Advisor, MF Representative and MMA Trust Officer with MMA since 2009.</li> <li>W. Lee Shertzer: Born July 14, 1964. Charter Life Underwriter (CLU); Certified Financial Planner (CFP); Over the past 14 years have built an independent insurance and investment firm managing over 100 million in assets.</li> </ul>	
7.	MMA Trust Company is licensed as a Federal Savings Bank and is engaged in trust services and administration, financial planning, and estate administration.	
8.	<p>Other Business Activities/Other Financial Industry Activities or Affiliations:</p> <ul style="list-style-type: none"> <li>MMA Securities, Inc. - MMA Trust Company is affiliated with a broker-dealer, MMA Securities, Inc. which conducts business as a constructive receipt broker-dealer. MMA Securities is registered with FINRA, but does not have any registered representatives. MMA Securities' sole function is to receive commission overrides from ProEquities, a registered broker-dealer relating to the sale of equities by the Mennonite Mutual Aid distribution system.</li> <li>MMA Capital Management, Inc. - MMA Trust Company is affiliated with MMA Capital Management who provides investment advisory services primarily to institutional clients.</li> <li>MMA Holdings, Inc. - The sole stockholder of all outstanding stock of MMA Trust Company is MMA Holdings, Inc. a corporation organized under the laws of Indiana.</li> </ul>	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>MMA Trust Company</b>		IRS Empl. Ident. No.: <b>35-2140529</b>
Item of Form (identify)	Answer	
9.	<p>MMA Insurance Company - MMA Trust Company is affiliated with MMA Insurance Company who is an insurance company.</p> <p>Mennonite Mutual Aid Association - MMA Trust Company is affiliated with Mennonite Mutual Aid Association, a fraternal benefit society organized under the laws of Indiana, offering insurance products and services to its members.</p> <p>MMA Trust Company has an affiliation with The Mennonite Foundation, Inc. whose assets are managed by some of the same individuals that provide services for MMA Trust Company.</p> <p>MMA Praxis Mutual Funds - MMA Trust Company is affiliated with MMA Capital Management, Inc. who services as investment advisor to MMA Praxis Mutual Funds.</p> <p>MMA Trust Company, on limited occasions, may recommend to clients that they buy or sell securities or investment products in which an affiliate has a financial interest. Specifically, where an account is too small to warrant its own stock portfolio, MMA Trust Company may recommend MMA Praxis Mutual Fund, a registered, open-end investment company. Related persons namely MMA Insurance Company and/or Mennonite Mutual Aid Association buy securities for themselves that MMA Trust Company recommends to its clients.</p> <p>It is anticipated that MMA Trust Company at some point may invest its surplus in bonds and/or securities. In those instances where it would invest in bonds or securities, it also recommends to clients, clients would always have priority in those purchases or sales. Clients' securities are always reported as separate accounts and may not be transferred from the client account to MMA Trust Company's operating account. Clients' securities can only be released from the account by the custodian upon receipt by the custodian of written instructions signed by two of MMA Trust Company's authorized officers.</p> <p>MMA Trust Company has adopted a Code of Ethics (Code), as required by Rule 204A-1 of the Investment Advisers Act of 1940, that governs conflicts of interest in personal securities transactions which can arise when persons affiliated with the Company invest in securities that are held or are to be acquired by registered investment companies (mutual funds). The Code provides procedures designed to identify prohibited purchases and sales, exempted transactions, and the reporting requirements for persons affiliated with the Company. A copy of the Code is provided to any client or prospective client upon request.</p>	
10.	MMA Trust Company's minimum is generally \$100,000 per relationship. Account minimums are open to negotiation.	
12.	<p>MMA Trust Company generally has the authority to determine, without obtaining specific client consent, the securities, and the amounts of securities, to be bought and sold within an account, the broker or dealer to be used, and the commission rates to be paid. In selecting brokers, MMA Trust Company retains the right to impose its ethical investment guidelines. Broker's fees are comparable to other regional institutions.</p> <p>In specialized circumstances at the customer's request, MMA Trust Company may establish a non-discretionary account.</p>	
13.	<p>For assets invested in MMA Praxis Mutual Funds, MMA Capital Management, Inc., the investment adviser to MMA Praxis Mutual Funds, has agreed to share a portion of its revenue with MMA Trust Company as compensation for services rendered.</p> <p>MMA Trust Company may directly compensate licensed representatives for a client referral. In any such case, Rule 206(4)-3 is strictly observed.</p>	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>MMA Trust Company</b>		IRS Empl. Ident. No.: <b>35-2140529</b>
Item of Form (identify)	Answer	
<b>Miscellaneous</b>	<p><u>Aggregate ("Bunched") Trades:</u> MMA Trust Company investment managers aggregate client orders for reasons including: 1) when investment managers deem a particular security is appropriate for multiple clients; 2) in order to obtain best execution for its clients, so long as doing so is consistent with the terms of MMA Trust Company's advisory agreement with each client for which trades are being aggregated. Typically, MMA Trust Company is able to obtain lower commission rates on large share count trades versus small share count trades. When aggregating client orders, no advisory client will be favored over any other client. For example, all clients will receive the average share price of all of MMA Trust Company's transactions of that security on that business day and will share transaction costs (e.g. commissions, SEC fees) <i>pro rata</i> based on each client's participation in the bunched transaction.</p> <p>If the order is completely filled, shares will be allocated in accordance with the previously prepared Portfolio Adjustment spreadsheet. Participating client accounts will receive the average share price of all of MMA Trust Company's transactions of that security on that business day and will share transaction costs (e.g. commissions, SEC fees) <i>pro rata</i> based on each client's participation in the aggregated transaction.</p> <p>If the order is only partially filled, shares will be allocated on a <i>pro rata</i> based on the Portfolio Adjustment spreadsheet, unless the <i>pro rata</i> amount allocated to an individual account is considered an uneconomic lot size, which we define as fewer than 25 shares. In such cases, these accounts may not participate in that day's allocation or may be completely filled before larger accounts are given their <i>pro rata</i> amount.</p> <p>This provision is included due to the significant number of client accounts managed in the MMA Trust Company, for which administrative burden and expense do not warrant multiple very small share count trades in order to enter or exit a position.</p> <p>Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out of the custodian bank or broker-dealer as soon as practicable following the settlement of the aggregated trade.</p> <p><u>Expense Reimbursement:</u> MMA Trust Company has entered into an arrangement with Mennonite Retirement Trust limiting the investment advisory fees to an agreed upon schedule. In order to assist MMA Trust Company in keeping the overall fees at the agreed upon schedule, the investment adviser for MMA Praxis Mutual Funds has agreed to reimburse MMA Trust company for any fees charged participants over certain levels. The investment adviser for MMA Praxis Mutual Funds is MMA Capital Management, Inc., who has an affiliation with MMA Trust Company.</p>	