¬smarsh™ Connected Suite Supervision Policies

Policy Name	Description	Governing Body	Relevant Regulations	Key Concerns	Industry
Anti-Money Laundering	Includes language pertinent to the concealment of illegally obtained money so that it appears to have originated from legitimate sources.	FINRA, Federal Gvt.	The Bank Secrecy Act, The USA Patriot Act, FINRA Rule 3310	Regulatory compliance Detection of illegal activities used in the practice of hiding illegal finances.	Financial Services
Bribery	Includes language pertinent to giving or accepting a bribe.	Federal Gvt, FINRA	Foreign Corrupt Practices Act, Federal Bank Bribery Law, The General Federal Bribery Statute, FINRA Rule 4530	Regulatory Detection of illegal gifts, entertainment and compensation provided for financial gain or benefits.	Financial Services, Public Sector
Broker Error	Includes language pertinent to errors associated with transacting business.	Customer Internal Rules	Check and Balance relevant to Internal Policies and Procedures	Detection of unintentional errors relative to transactions, including but not limited to misapplied payments, deposits and trades.	All
Collusion	Includes language pertinent to secret or illegal conspiracy in an effort to deceive others.	Federal Gvt.	Sherman Anti-trust Act, Securities Exchange Act 1933, Securities Exchange Act 1934, Investment Advisers Act of 1940	Regulatory Compliance Detection of illegal activity between competitors for financial benefit or gain.	Financial Services
Diminished Capacity	Includes language pertinent to a client's difficulty in remembering, performing simple tasks, speaking and orientation.	FINRA	FINRA Rule 2111	Regulatory Compliance Detection of questionable transactions or activities involving clients with diminished mental capacity.	Financial Services
Gambling in the Workplace	Includes language pertinent to potential gambling activities in the workplace.	Customer Internal Rules	Check and Balance relevant to Internal Policies and Procedures	Detection of gambling activities within the workplace.	All
Gifts and Entertainment	Includes language pertinent to inappropriate activities involving gifts to clients and prospects	FINRA	FINRA Rule 2320	Regulatory Compliance Detection of gifts, entertainment and compensation exceeding allowed limits or unauthorized actions.	Financial Services
Hard Sell	Includes language pertinent to forceful or high pressure sales tactics.	FINRA	FINRA Rule 2111	Regulatory Compliance Detection of high pressure sale tactics relative to investments and insurance.	Financial Services
Human Resources	Includes language pertinent to potential harassment and/violence in the workplace.	Customer Internal Rules	Check and Balance relevant to Internal Policies and Procedures	Detection of inappropriate behavior within the workplace.	All
Incoming Complaint	Includes language pertinent to the dissatisfaction on a customer's behalf to a responsible party.	FINRA	FINRA Rule 4530, FINRA 4513, FINRA 2111	Regulatory compliance Detection of customer complaints for handling and reporting	Financial Services
Insider Information	Includes language pertinent to Illegally trading on the stock market for one's own advantage through having access to confidential information	FINRA, SEC	SEC Rule 10b, SEC Regulation Fair Disclosure, FINRA Rule 3110, FINRA Rule 5270	Regulatory Compliance Detection of illegal trading activities transacted using non-public information.	Financial Services
Instant Message/ Social Media	Includes acronyms and abbreviations pertinent to inappropriate investment and insurance business practices.	FINRA, SEC	FINRA Rule 2111, SEC Rule 10b	Regulatory Compliance Detection of questionable business practices including but limited to inappropriate guarantees.	Financial Services
Internal Use Only	Includes language pertinent to Information or Material which is not permitted to be utilized with the public or unauthorized personnel.	Customer Internal Rules	Check and Balance relevant to Internal Policies and Procedures	Detection of outbound documents and communications containing internal use only language.	All
IPO	Includes language pertinent to potentially fraudulent actions involving an initial public offering.	FINRA, SEC	Securities Exchange Act 1933, FINRA Rule 5130	Regulatory Compliance Detection of illegal promotion or trading activities associated with an Initial Public Offering.	Financial Services
Legal Issues	Includes language pertinent to potential issues with the law.	FINRA	FINRA Rule 4530, FINRA Rule 1122	Regulatory Compliance Detection of legal actions requiring disclosure and reporting.	Financial Services
Outside Business Activity	Includes language pertinent to outside bsuiness activities	FINRA, SEC	FINRA Rule 3270, Investment Advisers Act of 1940 Rule 206(4)	Detection of reported or unreported outside business activities.	Financial Services

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Privacy	Includes language pertinent to the potential breach of private customer or business information.	SEC, Federal Gvt	HIPAA, (SEC) Rule 30 of Regulation S-P	Regulatory Compliance Detection of private and confidential information being sent outside the Company.	Financial Services, Health-care, Public Sector
Profanity	Includes inappropriate language.	Customer Internal Rules	Check and Balance relevant to Internal Policies and Procedures	Detection of inappropriate language being sent outside the Company.	All
Puffery	Includes language pertinent to exaggerated investment advice.	FINRA	FINRA Rule 2210	Detection of questionable business practices including inappropriate guarantees.	Financial Services
Regulatory	Includes language pertinent to government and regulatory related communications.	FINRA	FINRA Rule 4530	Regulatory compliance Detection of communications from regulatory bodies containing issues requiring disclosure and reporting.	Financial Services
Reply to Complaint	Includes language pertinent to a responsible party's response to a customer's complaint.	FINRA	FINRA Rule 4530, FINRA 2111	Regulatory compliance Detection of customer complaints for handling and reporting	Financial Services
Risk Applications	Includes language pertinent to the use of prohibited encrypted messaging applications	FINRA, SEC	FINRA Rule 2210, FINRA Rule 4511, Investment Advisers Act of 1940 Rule 204-2, SEA Rules 17a-3 and 17a-4	Detection of prohibited encrypted messaging applications	Financial Services
Sales Practices	Includes language pertinent to inappropriate investment and insurance business practices.	FINRA, SEC	FINRA Rule 2111, SEC Rule 10b	Regulatory Compliance Detection of questionable business practices including but limited to forgery, churning and replacement.	Financial Services
Seminars	Includes language pertinent to potential fraudulent conduct within investment or insurance seminars.	FINRA	FINRA Rule 2210	Regulatory Compliance Detection of questionable digital communications pertaining to client seminars.	Financial Services
SMARSH Exclusion Prefix	Excludes messages using URL address prefixes that are indicative of SPAM.	Customer Internal Rules	SPAM Rules	Reducing white noise Reducing false positives	All
SMARSH Exclusion (Unsubscribe/ Bulk Language)	Excludes Messages using language indicative to inbound SPAM.	Customer Internal Rules	SPAM Rules	Reducing white noise Reducing false positives	All
SMS/Texting	Includes acronyms and abbreviations pertinent to text messaging inappropriate language	FINRA, SEC	FINRA rule 2111, SEC Rule 10b	Detection of questionable business practices including but limited to inappropriate guarantees.	Financial Services
Stock Manipulation	Includes language pertinent to a deliberate attempt to interfere with the fair operation of the stock market in an effort to create a misleading appearances with respect to the price of, or market for a security, commodity or currency.	FINRA, SEC	Securities Exchange Act of 1934, FINRA Rule 5270, FINRA Rule 2372, FINRA Rule 5270	Regulatory Compliance Detection of questionable activity affecting the volatility of a security.	Financial Services
U-4 /ADV Issues	Includes language pertinent to the violation of securities, insurance, commodities, financial or investment-related laws, rules, regulations or standards of conduct of any domestic or foreign regulatory body or self-regulatory organization.	FINRA, SEC	FINRA Rule 4530, FINRA Rule 1122, Securities Exchange Act of 1940	Regulatory Compliance Detection of events requiring disclosure and reporting on the Form U-4 or Form ADV	Financial Services
Unauthorized Activity	Includes language pertinent to actions that were not requested or sanctioned.	FINRA, SEC	FINRA Rule 2010, SEC Rule 10b-5	Regulatory Compliance Detection of transactions or activities not sanctioned by a client.	Financial Services
Unauthorized Channels	Includes language indicating conversations are taken offline	FINRA, SEC	FINRA Rule 2210, FINRA Rule 4511, Investment Advisers Act of 1940 Rule 204-2, SEA Rules 17a-3 and 17a-4	Detection of conversations taken offline	Financial Services
Unethical Practices	Includes language pertinent to questionable rules of conduct.	FINRA, SEC	Securities Exchange Act 1933, Securities Exchange Act 1934, Investment Advisers Act of 1940, FINRA 2111	Regulatory Compliance Detection of illegal or deceptive business practices for financial benefit or gain.	Financial Services

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