

## THOMSON REUTERS PRACTICAL LAW

## SEC Record Retention Schedule

by Practical Law Litigation

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*A schedule of the records that must be retained by certain national securities exchange members, brokers and dealers, money market funds, registered investment companies, investment advisers, transfer agents, and other entities that are regulated by the Securities and Exchange Commission.*

### GENERAL

Record retention schedules should list the records that employees typically create and receive, as well as those that they infrequently handle. The schedules should list each type of record alongside the minimum length of time that employees must retain it. Certain regulations requiring the retention of specific records apply only to particular types of entities. In addition to the rules and regulations listed in the record retention schedule below, there are specific record-keeping requirements that narrowly affect certain entities according to their industry, regulators, and member organizations (for example, the [New York Stock Exchange](#)).

The schedules below list the record retention requirements for certain national securities exchange members, brokers and dealers, money market funds, registered investment companies, investment advisers, transfer agents, alternative trading systems, and other entities that are regulated by the [Securities and Exchange Commission](#) (SEC). They do not cover record retention requirements imposed by state law. They may be incorporated into a company's general records retention schedule. Counsel for SEC-regulated companies should review the SEC's record retention regulations to determine which of the record types listed below they should include in their company's record management system.

Using an outside recordkeeping service does not relieve the SEC-regulated company of its record retention obligations, and the SEC-regulated company may be subject to liability for rule violations by the recordkeeping service (see, for example, [17 C.F.R. § 240.17a-4\(i\)](#); [SEC Guidance Letter re: Third-Party Recordkeeping Services under Rule 17a-4, April 12, 2018](#)).

For more information on how to draft a proper record retention policy, see [Practice Note, Drafting a Document Retention Policy](#) and [Standard Document, Document Retention Policy](#).

### SEC Record Retention Schedule - Certain Exchange Members, Brokers, and Dealers

RECORD	RETENTION PERIOD
Blotters or other records of original entry that contain: <ul style="list-style-type: none"><li>Daily records of purchases and sales of securities</li><li>Receipts and disbursements of cash and other debits and credits</li></ul>	6 years, the first 2 years in an easily accessible place

<p>Ledgers or other records that reflect:</p> <ul style="list-style-type: none"> <li>• Assets and liabilities</li> <li>• Income and expenses</li> <li>• Capital accounts</li> </ul>	6 years, the first 2 years in an easily accessible place
<p>Ledgers accounts or other records that itemize:</p> <ul style="list-style-type: none"> <li>• Cash and margin accounts for each customer</li> <li>• The purchases, sales, receipts, delivery of securities and commodities, and other debits and credits for each customer's members, brokers, dealers, and partners</li> </ul>	6 years, the first 2 years in an easily accessible place
Securities records or ledgers, with specific information for each security listed in 17 C.F.R. § 240.17a-3(a)(5)	6 years, the first 2 years in an easily accessible place
Records of office listings with the names of persons who can explain the types of records that are maintained at that office	6 years, the first 2 years in an easily accessible place
Records of persons responsible for drafting policies and procedures for complying with federal requirements for self-regulation	6 years, the first 2 years in an easily accessible place
<p>Ledgers showing:</p> <ul style="list-style-type: none"> <li>• Securities in transfer</li> <li>• Dividends and interest received</li> <li>• Securities borrowed and loaned</li> <li>• Money borrowed and loaned and collateral</li> <li>• Securities failed to receive and failed to deliver</li> <li>• Long and short securities record differences</li> <li>• Repurchase and reverse repurchase agreements</li> </ul>	3 years, the first 2 years in an easily accessible place
Memoranda of brokerage orders, executed and unexecuted [For a detailed explanation, see 17 C.F.R. § 240.17a-3(a)(6)]	3 years, the first 2 years in an easily accessible place
Memoranda of purchases and sales [For a detailed explanation, see 17 C.F.R. § 240.17a-3(a)(7)]	3 years, the first 2 years in an easily accessible place
Copies of confirmations for purchases and sales of securities, including repurchase and reverse repurchase agreements and notices of other debits and credits for securities, cash, and other items	3 years, the first 2 years in an easily accessible place
Records for cash and margin accounts [For a detailed explanation, see 17 C.F.R. § 240.17a-3(a)(9)]	3 years, the first 2 years in an easily accessible place
<p>Records of all options including:</p> <ul style="list-style-type: none"> <li>• Puts</li> <li>• Calls</li> <li>• Spreads</li> <li>• Straddles</li> </ul>	3 years, the first 2 years in an easily accessible place
A record of the proof of money balances of all ledger accounts in the form	Unspecified

of trial balances, and a record of the computation of aggregate indebtedness and net capital, as of the trial balance date, under § 240.15c3-1	
[For a detailed explanation, see 17 C.F.R. §§ 240.17a-3(a)(11) and 240.15c3-1]	
<p>The following records regarding any internal broker-dealer system in which the broker dealer is the sponsor:</p> <ul style="list-style-type: none"> <li>• Records of customers with access to the system</li> <li>• Daily summaries of trading in the broker-dealer system</li> <li>• Time-sequenced records of each transaction effected through the broker-dealer system</li> </ul> <p>[For a detailed explanation and applicable definitions, see 17 C.F.R. § 240.17a-3(a)(16)]</p>	3 years, the first 2 years in an easily accessible place
Records of written customer complaints	3 years, the first 2 years in an easily accessible place
Records of security purchases and sales, for compensation purposes	3 years, the first 2 years in an easily accessible place
Records of all agreements related to the relationship between each associated person and the member, including a summary of each associated person's compensation arrangement or plan with the member, including commission and concession schedules, and, if compensation is determined by factors other than payment per trade, the method by which compensation is determined.	3 years, the first 2 years in an easily accessible place
Documents showing compliance with federal requirements for self-regulatory organizations	3 years, the first 2 years in an easily accessible place
Office specific books and records, analogous to those required in 17 C.F.R. §§ 240.17a-3(a)(1), (6), (7), (12), (17), (18)(i), (19), (20), (21), and (22)	3 years, the first 2 years in an easily accessible place
Check books, bank statements, cancelled checks, and cash reconciliations	3 years, the first 2 years in an easily accessible place
Bills receivable, paid or unpaid, related to business	3 years, the first 2 years in an easily accessible place
Original copies of business communications, including sales scripts and those subject to the rules of self-regulation	3 years, the first 2 years in an easily accessible place
Trial balances, computations of aggregate indebtedness and net capital (with related work papers), financial statements, branch office reconciliations, and internal audit working papers	3 years, the first 2 years in an easily accessible place
Account guarantees, powers of attorney, resolutions empowering an agent to act on behalf of a corporation, and evidence of granting discretionary authority in relation to any account	3 years, the first 2 years in an easily accessible place
Written agreements	3 years, the first 2 years in an easily accessible place
The information described in 17 C.F.R. § 240.17a-4(b)(8)(i) to (xv), used to generate audit reports, under Form X-17A-5, Part II, Part IIA or Part IIB, and 17 C.F.R. § 240.17a-5(d), 12(b)	3 years, the first 2 years in an easily accessible place
The records required to be made under 17 C.F.R. § 240.15c3-3(d)(5),	3 years, the first 2 years in an easily accessible place

including the procedures to comply with the possession or control requirements of margin securities, and the records required to be made under 17 C.F.R. § 240.15c3-3(o), related to securities futures products	
Documents showing internal risk management controls, as specified under 17 C.F.R. § 240.15c3-4, and the results of periodic reviews conducted under 17 C.F.R. § 240.15c3-4(d).	3 years, the first 2 years in an easily accessible place
Notices to customers related to an internal broker-dealer system [For a detailed explanation, see 17 C.F.R. § 240.17a-4(b)(11)]	3 years, the first 2 years in an easily accessible place
The records required to be made under 17 C.F.R. § 240.15c3-1e(c)(4)(vi)	3 years, the first 2 years in an easily accessible place
Any policies and procedures used to assess creditworthiness under 17 C.F.R. § 240.15c3-1(c)(2)	3 years, the first 2 years in an easily accessible place
Account cards or records related to the terms and conditions of opening and maintaining customers' accounts after the closure of those accounts	6 years
Corporate governance documents including: <ul style="list-style-type: none"> <li>• Partnership articles</li> <li>• Articles of incorporation or charters</li> <li>• Minute books and stock certificate books</li> <li>• Records such as articles of organization or formation</li> <li>• Forms BD, Forms BDW, and amendments to these forms</li> <li>• Licenses or other documents showing registration with any securities regulatory authority</li> </ul>	Life of enterprise and any successor enterprise
Questionnaires or applications for employment [For a detailed explanation of required documents and information, see 17 C.F.R. § 240.17a-3(a)(12)]	3 years after the person's employment and any other connection with the member has ended
Records that must be maintained under paragraph (d) of 17 C.F.R. § 240.17f-2	3 years after the termination of employment or association of the person required to be fingerprinted under 17 C.F.R. § 240.17f-2
Records that must be maintained under paragraph (e) of 17 C.F.R. § 240.17f-2	Life of enterprise
Copies of Forms x-17F-1A filed under 17 C.F.R. § 240.17f-1, agreements between reporting institutions regarding registration or other aspects of 17 C.F.R. § 240.17f-1, and confirmations or other information received from the SEC as result of an inquiry	3 years
Account record information required for accounts with a natural person as a customer or owner, as specified under 17 C.F.R. § 240.17a-3(a)(17)	6 years from the date the account was closed or 6 years from the date on which information was replaced or updated, whichever is earlier
Reports required or requested by a securities regulatory authority, including securities regulatory authority examination reports	3 years after the report date
Compliance, supervisory, and procedures manuals and their updates and revisions, describing policies and practices for compliance with applicable laws and rules and the associated supervisory roles of natural persons to ensure compliance.	3 years after ending use of the manual
Reports generated to review unusual activity in customer accounts	18 months after the report is generated

Records of credit, market, and liquidity risk management controls that are required under 17 C.F.R. § 240.17a-3(a)(23)	3 years after ending use of the risk management controls
Records in connection with trading activities of US institutional investors in an office of the registered broker or dealer located in the US, and all other records required under 17 C.F.R. § 240.15a-6(a)(3)(iii)(E)  [Applicable to foreign brokers and dealers]	Unspecified
Documents and information required under 17 C.F.R. § 240.15c2-11(a) if a broker or dealer publishes any quotation for a security or submits any quotation for publication	3 years, the first 2 years in an easily accessible place
Records required under 17 C.F.R. § 240.15c2-11(b) for security quotations governed by this section of the CFR	3 years, the first 2 years in an easily accessible place
Copies of written agreements relating to penny stocks required under 17 C.F.R. § 240.15g-2(c)	3 years, the first 2 years in an easily accessible place
Copies of records related to penny stocks required under 17 C.F.R. § 240.15g-6(a)	3 years, the first 2 years in an easily accessible place
Records specified in Chapter X of Title 31 of the Code of Federal Regulations  [Applicable to registered brokers or dealers who are subject to the requirements of the Currency and Foreign Transactions Reporting Act of 1970]	The time period specified in Chapter X of Title 31 of the Code of Federal Regulations or the time period specified in 17 C.F.R. § 240.17a-4, whichever is longer
Records of organization structure, policies, procedures, pending arbitrations, balance sheets, income statements, long and short securities positions, the value of instruments with off-balance-sheet risk, the value of bridge loans, the value of commercial paper, and real estate data, as specified in 17 C.F.R. § 240.17h-1T(a)(1)(ii)-(x)	3 years in an easily accessible place
Quarterly reports on routing of non-directed orders of national market system (NMS) securities, as specified in 17 C.F.R. § 242.606(a).  [The Rule 606(a) recordkeeping requirement became effective January 18, 2019 with compliance required beginning May 20, 2019.]	Must be maintained on a free and publicly accessible website for 3 years from the initial date of posting.

## SEC RECORD RETENTION SCHEDULE - CERTAIN EXCHANGE MEMBERS, BROKERS, AND DEALERS

The following version of the SEC record retention schedule for certain exchange members, brokers, and dealers includes a third column to indicate the regulations that cover each type of records. This third column does not need to be part of a company's document retention policy.

RECORD	RETENTION PERIOD	REASON
Blotters or other records of original entry that contain: <ul style="list-style-type: none"> <li>Daily records of purchases and sales of securities</li> <li>Receipts and disbursements of cash and other debits and credits</li> </ul>	6 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(1) and 240.17a-4(a)
Ledgers or other records that reflect:	6 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(2) and 240.17a-4(a)

<ul style="list-style-type: none"> <li>• Assets and liabilities</li> <li>• Income and expenses</li> <li>• Capital accounts</li> </ul>		
<p>Ledgers accounts or other records that itemize:</p> <ul style="list-style-type: none"> <li>• Cash and margin accounts for each customer</li> <li>• The purchases, sales, receipts, delivery of securities and commodities, and other debits and credits for each customer's members, brokers, dealers, and partners</li> </ul>	6 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(3) and 240.17a-4(a)
Securities records or ledgers, with specific information for each security listed in <a href="#">17 C.F.R. § 240.17a-3(a)(5)</a>	6 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(5) and 240.17a-4(a)
Records of office listings with the names of persons who can explain the types of records that are maintained at that office	6 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(21) and 240.17a-4(a)
Records of persons responsible for drafting policies and procedures for complying with federal requirements for self-regulation	6 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(22) and 240.17a-4(a)
<p>Ledgers showing:</p> <ul style="list-style-type: none"> <li>• Securities in transfer</li> <li>• Dividends and interest received</li> <li>• Securities borrowed and loaned</li> <li>• Money borrowed and loaned and collateral</li> <li>• Securities failed to receive and failed to deliver</li> <li>• Long and short securities record differences</li> <li>• Repurchase and reverse repurchase agreements</li> </ul>	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(4) and 240.17a-4(b)(1)
Memoranda of brokerage orders, executed and unexecuted [For a detailed explanation, see <a href="#">17 C.F.R. § 240.17a-3(a)(6)</a> ]	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(6) and 240.17a-4(b)(1)
Memoranda of purchases and sales [For a detailed explanation, see <a href="#">17 C.F.R. § 240.17a-3(a)(7)</a> ]	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(7) and 240.17a-4(b)(1)
Copies of confirmations for purchases and sales of securities, including repurchase and reverse repurchase agreements and notices of other debits and credits for securities, cash, and other items	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(8) and 240.17a-4(b)(1)
Records for cash and margin accounts [For a detailed explanation, see <a href="#">17 C.F.R. §</a>	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-3(a)(9) and 240.17a-4(b)(1)

<a href="#">240.17a-3(a)(9)]</a>		
Records of all options including: <ul style="list-style-type: none"> <li>• Puts</li> <li>• Calls</li> <li>• Spreads</li> <li>• Straddles</li> </ul>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.17a-3(a)(10)</a> and <a href="#">240.17a-4(b)(1)</a>
A record of the proof of money balances of all ledger accounts in the form of trial balances, and a record of the computation of aggregate indebtedness and net capital, as of the trial balance date, under <a href="#">§ 240.15c3-1</a> [For a detailed explanation, see <a href="#">17 C.F.R. §§ 240.17a-3(a)(11)</a> and <a href="#">240.15c3-1</a> ]	Unspecified	<a href="#">17 C.F.R. §§ 240.17a-3(a)(11)</a> and <a href="#">240.15c3-1</a>
The following records regarding any internal broker-dealer system in which the broker dealer is the sponsor: <ul style="list-style-type: none"> <li>• Records of customers with access to the system</li> <li>• Daily summaries of trading in the broker-dealer system</li> <li>• Time-sequenced records of each transaction effected through the broker-dealer system</li> </ul> [For a detailed explanation and applicable definitions, see <a href="#">17 C.F.R. § 240.17a-3(a)(16)</a> ]	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.17a-3(a)(16)</a> and <a href="#">240.17a-4(b)(1)</a>
Records of written customer complaints	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.17a-3(a)(18)</a> and <a href="#">240.17a-4(b)(1)</a>
Records of security purchases and sales, for compensation purposes	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.17a-3(a)(19)(i)</a> and <a href="#">240.17a-4(b)(1)</a>
Records of all agreements related to the relationship between each associated person and the member, including a summary of each associated person's compensation arrangement or plan with the member, including commission and concession schedules, and, if compensation is determined by factors other than payment per trade, the method by which compensation is determined.	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.17a-3(a)(19)(ii)</a> and <a href="#">240.17a-4(b)(1)</a>
Documents showing compliance with federal requirements for self-regulatory organizations	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.17a-3(a)(20)</a> and <a href="#">240.17a-4(b)(1)</a>
Office specific books and records, analogous to those required in <a href="#">17 C.F.R. §§ 240.17a-</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.17a-3(g)</a> and <a href="#">240.17a-4(b)(1)</a>

3(a)(1), (6), (7), (12), (17), (18)(i), (19), (20), (21), and (22)		
Check books, bank statements, cancelled checks, and cash reconciliations	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(2)
Bills receivable, paid or unpaid, related to business	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(3)
Original copies of business communications, including sales scripts and those subject to the rules of self-regulation	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(4)
Trial balances, computations of aggregate indebtedness and net capital (with related work papers), financial statements, branch office reconciliations, and internal audit working papers	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(5)
Account guarantees, powers of attorney, resolutions empowering an agent to act on behalf of a corporation, and evidence of granting discretionary authority in relation to any account	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(6)
Written agreements	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(7)
The information described in 17 C.F.R. § 240.17a-4(b)(8)(i) to (xv), used to generate audit reports, under Form X-17A-5, Part II, Part IIA or Part IIB, and 17 C.F.R. § 240.17a-5(d), 12(b)	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(8)
The records required to be made under 17 C.F.R. § 240.15c3-3(d)(5), including the procedures to comply with the possession or control requirements of margin securities, and the records required to be made under 17 C.F.R. § 240.15c3-3(o), related to securities futures products	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(9)
Documents showing internal risk management controls, as specified under 17 C.F.R. § 240.15c3-4, and the results of periodic reviews conducted under 17 C.F.R. § 240.15c3-4(d).	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(10)
Notices to customers related to an internal broker-dealer system [For a detailed explanation, see 17 C.F.R. § 240.17a-4(b)(11)]	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(11)
The records required to be made under 17 C.F.R. § 240.15c3-1e(c)(4)(vi)	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(12)
Any policies and procedures used to assess creditworthiness under 17 C.F.R. § 240.15c3-1(c)(2)	3 years, the first 2 years in an easily accessible place	17 C.F.R. §§ 240.17a-4(b)(13)



Account cards or records related to the terms and conditions of opening and maintaining customers' accounts after the closure of those accounts	6 years	17 C.F.R. § 240.17a-4(c)
Corporate governance documents including: <ul style="list-style-type: none"> <li>• Partnership articles</li> <li>• Articles of incorporation or charters</li> <li>• Minute books and stock certificate books</li> <li>• Records such as articles of organization or formation</li> <li>• Forms BD, Forms BDW, and amendments to these forms</li> <li>• Licenses or other documents showing registration with any securities regulatory authority</li> </ul>	Life of enterprise and any successor enterprise	17 C.F.R. § 240.17a-4(d)
Questionnaires or applications for employment [For a detailed explanation of required documents and information, see <a href="#">17 C.F.R. § 240.17a-3(a)(12)</a> ]	3 years after the person's employment and any other connection with the member has ended	17 C.F.R. §§ 240.17a-3(a)(12) and 240.17a-4(e)(1)
Records that must be maintained under paragraph (d) of <a href="#">17 C.F.R. § 240.17f-2</a>	3 years after the termination of employment or association of the person required to be fingerprinted under <a href="#">17 C.F.R. § 240.17f-2</a>	17 C.F.R. §§ 240.17a-3(a)(13) and 240.17a-4(e)(2)
Records that must be maintained under paragraph (e) of <a href="#">17 C.F.R. § 240.17f-2</a>	Life of enterprise	17 C.F.R. §§ 240.17a-3(a)(15) and 240.17a-4(e)(3)
Copies of Forms x-17F-1A filed under <a href="#">17 C.F.R. § 240.17f-1</a> , agreements between reporting institutions regarding registration or other aspects of <a href="#">17 C.F.R. § 240.17f-1</a> , and confirmations or other information received from the SEC as result of an inquiry	3 years	17 C.F.R. §§ 240.17a-3(a)(14) and 240.17a-4(e)(4)
Account record information required for accounts with a natural person as a customer or owner, as specified under <a href="#">17 C.F.R. § 240.17a-3(a)(17)</a>	6 years from the date the account was closed or 6 years from the date on which information was replaced or updated, whichever is earlier	17 C.F.R. §§ 240.17a-3(a)(17) and 240.17a-4(e)(5)
Reports required or requested by a securities regulatory authority, including securities regulatory authority examination reports	3 years after the report date	17 C.F.R. § 240.17a-4(e)(6)
Compliance, supervisory, and procedures manuals and their updates and revisions, describing policies and practices for compliance with applicable laws and rules and the associated supervisory roles of natural persons to ensure compliance.	3 years after ending use of the manual	17 C.F.R. § 240.17a-4(e)(7)
Reports generated to review unusual activity in customer accounts	18 months after the report is generated	17 C.F.R. § 240.17a-4(e)(8)

Records of credit, market, and liquidity risk management controls that are required under <a href="#">17 C.F.R. § 240.17a-3(a)(23)</a>	3 years after ending use of the risk management controls	<a href="#">17 C.F.R. § 240.17a-4(e)(9)</a>
Records in connection with trading activities of US institutional investors in an office of the registered broker or dealer located in the US, and all other records required under <a href="#">17 C.F.R. § 240.15a-6(a)(3)(iii)(E)</a>  [Applicable to foreign brokers and dealers]	Unspecified	<a href="#">17 C.F.R. § 240.15a-6(a)(3)(iii)(E)</a>
Documents and information required under <a href="#">17 C.F.R. § 240.15c2-11(a)</a> if a broker or dealer publishes any quotation for a security or submits any quotation for publication	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15c2-11(a) and 240.15c2-11(c)</a>
Records required under <a href="#">17 C.F.R. § 240.15c2-11(b)</a> for security quotations governed by this section of the CFR	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15c2-11(b) and 240.15c2-11(c)</a>
Copies of written agreements relating to penny stocks required under <a href="#">17 C.F.R. § 240.15g-2(c)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15g-2(c) and 240.17a-4(b)</a>
Copies of records related to penny stocks required under <a href="#">17 C.F.R. § 240.15g-6(a)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15g-6(f) and 240.17a-4(b)</a>
Records specified in Chapter X of Title 31 of the Code of Federal Regulations  [Applicable to registered brokers or dealers who are subject to the requirements of the Currency and Foreign Transactions Reporting Act of 1970]	The time period specified in Chapter X of Title 31 of the Code of Federal Regulations or the time period specified in <a href="#">17 C.F.R. § 240.17a-4</a> , whichever is longer	<a href="#">17 C.F.R. § 240.17a-8</a>
Records of organization structure, policies, procedures, pending arbitrations, balance sheets, income statements, long and short securities positions, the value of instruments with off-balance-sheet risk, the value of bridge loans, the value of commercial paper, and real estate data, as specified in <a href="#">17 C.F.R. § 240.17h-1T(a)(1)(ii)-(x)</a>	3 years in an easily accessible place	<a href="#">17 C.F.R. § 240.17h-1T(a)(3)</a>
Quarterly reports on routing of non-directed orders of national market system (NMS) securities, as specified in <a href="#">17 C.F.R. § 242.606(a)</a> .  [The Rule 606(a) recordkeeping requirement became effective January 18, 2019 with compliance required beginning May 20, 2019.]	Must be maintained on a free and publicly accessible website for 3 years from the initial date of posting.	<a href="#">17 C.F.R. § 242.606(a)</a>

#### SEC Record Retention Schedule - Money Market Funds

RECORD	RETENTION PERIOD
<p>Written procedures related to:</p> <ul style="list-style-type: none"> <li>Funds using the amortized cost method</li> <li>Funds using the penny-rounding method</li> <li>Ongoing review of credit risks</li> <li>Securities subject to demand features or guarantees</li> <li>Adjustable rate securities without demand features</li> <li>Ten percent obligors of asset-backed securities</li> <li>Asset-backed securities not subject to guarantees</li> <li>Periodic stress testing</li> </ul> <p>[For a detailed explanation, see 17 C.F.R. § 270.2a-7(g)]</p>	6 years, the first 2 years in an easily accessible place
Records of the board of directors' considerations and actions taken in connection with the discharge of its responsibilities	6 years, the first 2 years in an easily accessible place
Records of credit risk analyses, including determinations that a portfolio security is an eligible security and determinations that the portfolio security presents minimal credit risks at the time the fund acquires the security or at later times that the board of directors determines that the investment adviser must reassess whether the security presents minimal credit risks.	3 years from the date the credit risks were most recently reviewed, in an easily accessible place
Determinations that a variable rate or floating rate security that is not subject to a demand feature, and for which maturity is determined under 17 C.F.R. § 270.2a-7(i)(1), (i)(2), or (i)(4), can reasonably be expected, on readjustment of its interest rate at all times during the life of the instrument, to have a market value that approximates its amortized cost	3 years from the date when the assessment was most recently made, in an easily accessible place
<p>Determinations showing the number of ten percent obligors deemed to be the issuers of all or a portion of the asset backed security for purposes of 17 C.F.R. § 270.2a-7(d)(3)(ii)(D), including the identities of the ten percent obligors and any determination that an asset-backed security will not have, or is unlikely to have, ten percent obligors deemed to be issuers of all or a portion of that asset-backed security</p> <p>[For a detailed explanation, see 17 C.F.R. § 270.2a-7(h)(5)]</p>	3 years from the date when the determination was most recently made, in an easily accessible place
Evaluations required by 17 C.F.R. § 270.2a-7(g)(7) regarding asset-backed securities not subject to guarantees	3 years from the date when the evaluation was most recently made, in an easily accessible place
Evaluations required by 17 C.F.R. § 270.2a-7(g)(4) regarding securities subject to one or more demand features or guarantees	3 years from the date when the evaluation was most recently made, in an easily accessible place
Stress testing reports required under 17 C.F.R. § 270.2a-7(g)(8)(ii)	6 years, the first 2 years in an easily accessible place

## SEC RECORD RETENTION SCHEDULE - MONEY MARKET FUNDS

The following version of the SEC-specific record retention schedule for money market funds includes a third column to indicate the regulations that cover each type of records. This third column does not need to be part of a document retention policy.

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RECORD	RETENTION PERIOD	REASON
<p>Written procedures related to:</p> <ul style="list-style-type: none"> <li>Funds using the amortized cost method</li> <li>Funds using the penny-rounding method</li> <li>Ongoing review of credit risks</li> <li>Securities subject to demand features or guarantees</li> <li>Adjustable rate securities without demand features</li> <li>Ten percent obligors of asset-backed securities</li> <li>Asset-backed securities not subject to guarantees</li> <li>Periodic stress testing</li> </ul> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 270.2a-7(g)</a>]</p>	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 270.2a-7(h)(1) and 270.2a-7(g)</a>
Records of the board of directors' considerations and actions taken in connection with the discharge of its responsibilities	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 270.2a-7(h)(2)</a>
Records of credit risk analyses, including determinations that a portfolio security is an eligible security and determinations that the portfolio security presents minimal credit risks at the time the fund acquires the security or at later times that the board of directors determines that the investment adviser must reassess whether the security presents minimal credit risks.	3 years from the date the credit risks were most recently reviewed, in an easily accessible place	<a href="#">17 C.F.R. § 270.2a-7(h)(3)</a>
Determinations that a variable rate or floating rate security that is not subject to a demand feature, and for which maturity is determined under <a href="#">17 C.F.R. § 270.2a-7(i)(1)</a> , <a href="#">(i)(2)</a> , or <a href="#">(i)(4)</a> , can reasonably be expected, on readjustment of its interest rate at all times during the life of the instrument, to have a market value that approximates its amortized cost	3 years from the date when the assessment was most recently made, in an easily accessible place	<a href="#">17 C.F.R. §§ 270.2a-7(h)(4) and 270.2a-7(g)(5)</a>
Determinations showing the number of ten percent obligors deemed to be the issuers of all or a portion of the asset backed security for purposes of <a href="#">17 C.F.R. § 270.2a-7(d)(3)(ii)(D)</a> , including the identities of the ten percent obligors and	3 years from the date when the determination was most recently made, in an easily accessible place	<a href="#">17 C.F.R. § 270.2a-7(h)(5)</a>

any determination that an asset-backed security will not have, or is unlikely to have, ten percent obligors deemed to be issuers of all or a portion of that asset-backed security  [For a detailed explanation, see <a href="#">17 C.F.R. § 270.2a-7(h)(5)</a> ]		
Evaluations required by <a href="#">17 C.F.R. § 270.2a-7(g)(7)</a> regarding asset-backed securities not subject to guarantees	3 years from the date when the evaluation was most recently made, in an easily accessible place	<a href="#">17 C.F.R. § 270.2a-7(h)(6)</a>
Evaluations required by <a href="#">17 C.F.R. § 270.2a-7(g)(4)</a> regarding securities subject to one or more demand features or guarantees	3 years from the date when the evaluation was most recently made, in an easily accessible place	<a href="#">17 C.F.R. §§ 270.2a-7(h)(7)</a> and <a href="#">270.2a-7(g)(4)</a>
Stress testing reports required under <a href="#">17 C.F.R. § 270.2a-7(g)(8)(ii)</a>	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 270.2a-7(h)(8)</a>

#### SEC Record Retention Schedule - Registered Investment Companies

RECORD	RETENTION PERIOD
Codes of ethics	5 years, in an easily accessible place
Records of violations of the code of ethics and actions taken as a result of the violations	5 years from the end of the fiscal year in which the violation took place, in an easily accessible place
Copies of each report made by an Access Person	5 years, the first 2 years in an easily accessible place
Records of all persons required to make reports under 17 C.F.R. § 270.17j-1(d) or who are responsible for reviewing these reports	5 years, in an easily accessible place
A copy of each report required by 17 C.F.R. § 270.17j-1(c)(2)(ii)	5 years from the end of the fiscal year in which the report is made, the first 2 years in an easily accessible place
Record of any decision, and the reasons supporting the decision, to approve the acquisition of securities under 17 C.F.R. § 270.17j-1(e)	5 years from the end of the fiscal year in which approval is granted
Accounts, books, and other documents relating to business that constitute the record forming the basis for financial statements that must be filed under section 30 of the Investment Company Act of 1940	Unspecified
Journals containing itemized, detailed daily records of all: <ul style="list-style-type: none"> <li>• Purchases and sales of securities</li> <li>• Receipts and deliveries of securities</li> <li>• Receipts and disbursements of cash</li> <li>• Other debits and credits</li> </ul> [For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-1(b)(1)</a> ]	Permanently, the first 2 years in an easily accessible place
General and auxiliary ledgers reflecting all assets, liability, reserve, capital, income, and expense accounts	Permanently, the first 2 years in an easily accessible place

[For a detailed explanation, see 17 C.F.R. § 270.31a-1(b)(2)]	
Securities records or ledgers reflecting each portfolio security on the trade date, all long and short positions carried by the investment company for its own account, and showing the location of all securities long and the off-setting position to all securities short	Permanently, the first 2 years in an easily accessible place
Corporate charters, certificates of incorporation or trust agreements, by-laws, and minute books of: <ul style="list-style-type: none"> <li>• Stockholders' and directors' or trustees' meetings</li> <li>• Directors' or trustees' committee meetings</li> <li>• Advisory board or advisory committee meetings</li> </ul>	Permanently, the first 2 years in an easily accessible place
Vouchers, memoranda, correspondence, checkbooks, bank statements, cancelled checks, cash reconciliations, cancelled stock certificates, and all schedules evidencing and supporting each computation of net asset value of the investment company shares  [For a detailed explanation, see 17 C.F.R. § 270.31a-2(a)(2)]	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
A record of each brokerage order given by or on behalf of the investment company for, or in connection with, the purchase or sale of securities  [For a detailed explanation, see 17 C.F.R. § 270.31a-1(b)(5)]	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
A record of all other portfolio purchases or sales showing details comparable to those prescribed in 17 C.F.R. § 270.31a-1(b)(5)	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
Record of all puts, calls, spreads, straddles, and other options in which the investment company has any interest or which the investment company has granted or guaranteed, and record of any contractual commitments to purchase, sell, receive, or deliver securities or other property  [For a detailed explanation, see 17 C.F.R. § 270.31a-1(b)(7)]	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
Records with proof of money balances in all ledger accounts in the form of trial balances prepared at least once a month	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
Records for each fiscal quarter  [For a detailed explanation of what must be included in these records, see 17 C.F.R. § 270.31a-1(b)(9)]	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
Records in the form of an appropriate memorandum identifying the entities authorizing the purchase or sale of portfolio securities  [For a detailed explanation, see 17 C.F.R. § 270.31a-1(b)(10)]	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
All advisory material received from the investment adviser, any advisory board or advisory committee, or any other persons from whom the investment company accepts investment advice, other than material which is furnished solely through uniform publications distributed generally	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
Until April 1, 2019, for registered investment companies subject to 17 C.F.R. §270.30b1-9, monthly portfolio holdings reports that would normally need to be included in Form N-PORT (17 C.F.R. § 274.150)	6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place
Any advertisement, pamphlet, circular, form letter, or other sales literature	6 years from the end of the fiscal year last used, the first 2 years in an

addressed to or intended for distribution to prospective investors	easily accessible place
Any record of the initial determination that a director is not an interested person of the investment company, and each subsequent determination that the director is not an interested person of the investment company  [For a detailed explanation, see 17 C.F.R. § 270.31a-2(a)(4)]	6 years, the first 2 years in an easily accessible place
Any materials used by the disinterested directors of an investment company to determine that a person who is acting as legal counsel to those directors is an independent legal counsel	6 years, the first 2 years in an easily accessible place
Any documents or other written information considered by the directors of the investment company in approving the terms or renewal of a contract or agreement between the company and an investment adviser	6 years, the first 2 years in an easily accessible place
The same records required to be maintained by brokers and dealers under section 17 of the Securities Exchange Act of 1934, to the extent those records are necessary or appropriate to record transactions  [Applicable to depositors and principal underwriters for any registered investment company other than a closed-end company]	6 years
Copies of the procedures and modifications to those procedures described in 17 C.F.R. § 270.10f-3(c)(10)(i) and (ii)	Permanently in an easily accessible place
Written record of each transaction described in 17 C.F.R. § 270.10f-3, setting forth from whom the securities were acquired, the identity of the underwriting syndicate's members, the terms of the transaction, and the information or materials on which the determination described in 17 C.F.R. § 270.10f-3(c)(10)(iii) was made	6 years, the first 2 years in an easily accessible place
Copies of any plan, agreement, or report made under 17 C.F.R. § 270.12b-1  [Applicable to registered open-end management investment companies]	6 years, the first 2 years in an easily accessible place
Procedures and any modifications described in 17 C.F.R. § 270.17a-7(e)	Permanently in an easily accessible place
Record of each transaction setting out: <ul style="list-style-type: none"> <li>• A description of the security purchased or sold</li> <li>• The identity of the person on the other side of the transaction</li> <li>• The terms of the purchase or sale transaction</li> <li>• The information or materials on which the determinations described in 17 C.F.R. § 270.17a-7(e)(3) were made</li> </ul>	6 years from the end of the fiscal year in which the transactions occurred, the first 2 years in an easily accessible place
Records that describe mergers and their terms	6 years, the first 2 years in an easily accessible place
Copies of the procedures adopted by the investment company's board of directors described in 17 C.F.R. § 270.17e-1(b)(1)	Permanently in an easily accessible place
Record of each transaction setting out: <ul style="list-style-type: none"> <li>• The amount and source of the commission, fee, or other remuneration received or to be received</li> <li>• The identity of the person acting as broker</li> <li>• The terms of the transaction</li> </ul>	6 years, the first 2 years in an easily accessible place

<ul style="list-style-type: none"> <li>The information or materials on which the findings described in 17 C.F.R. § 270.17e-1(b)(3) were made</li> </ul>	
Serially numbered notations of deposits, withdrawals, orders of withdrawals, and deliveries of securities and all other records specified in 17 C.F.R. § 270.17f-2(e)	1 year

## SEC RECORD RETENTION SCHEDULE - REGISTERED INVESTMENT COMPANIES

The following version of the SEC-specific record retention schedule for companies classified as registered investment companies includes a third column to indicate the regulations that cover each type of records. This third column does not need to be part of a document retention policy.

RECORD	RETENTION PERIOD	REASON
Codes of ethics	5 years, in an easily accessible place	<a href="#">17 C.F.R § 270.17j-1(f)(1)(A)</a>
Records of violations of the code of ethics and actions taken as a result of the violations	5 years from the end of the fiscal year in which the violation took place, in an easily accessible place	<a href="#">17 C.F.R § 270.17j-1(f)(1)(B)</a>
Copies of each report made by an Access Person	5 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R § 270.17j-1(f)(1)(C)</a>
Records of all persons required to make reports under <a href="#">17 C.F.R. § 270.17j-1(d)</a> or who are responsible for reviewing these reports	5 years, in an easily accessible place	<a href="#">17 C.F.R § 270.17j-1(f)(1)(D)</a>
A copy of each report required by <a href="#">17 C.F.R. § 270.17j-1(c)(2)(ii)</a>	5 years from the end of the fiscal year in which the report is made, the first 2 years in an easily accessible place	<a href="#">17 C.F.R § 270.17j-1(f)(1)(E)</a>
Record of any decision, and the reasons supporting the decision, to approve the acquisition of securities under <a href="#">17 C.F.R. § 270.17j-1(e)</a>	5 years from the end of the fiscal year in which approval is granted	<a href="#">17 C.F.R § 270.17j-1(f)(2)</a>
Accounts, books, and other documents relating to business that constitute the record forming the basis for financial statements that must be filed under section 30 of the Investment Company Act of 1940	Unspecified	<a href="#">17 C.F.R § 270.31a-1(a)</a>
Journals containing itemized, detailed daily records of all: <ul style="list-style-type: none"> <li>Purchases and sales of securities</li> <li>Receipts and deliveries of securities</li> <li>Receipts and disbursements of cash</li> <li>Other debits and credits</li> </ul> [For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-1(b)(1)</a> ]	Permanently, the first 2 years in an easily accessible place	<a href="#">17 C.F.R §§ 270.31a-1(b)(1) and 270.31a-2(a)(1)</a>



<p>General and auxiliary ledgers reflecting all assets, liability, reserve, capital, income, and expense accounts</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-1(b)(2)</a>]</p>	<p>Permanently, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(2)</a> and <a href="#">270.31a-2(a)(1)</a></p>
<p>Securities records or ledgers reflecting each portfolio security on the trade date, all long and short positions carried by the investment company for its own account, and showing the location of all securities long and the off-setting position to all securities short</p>	<p>Permanently, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(3)</a> and <a href="#">270.31a-2(a)(1)</a></p>
<p>Corporate charters, certificates of incorporation or trust agreements, by-laws, and minute books of:</p> <ul style="list-style-type: none"> <li>• Stockholders' and directors' or trustees' meetings</li> <li>• Directors' or trustees' committee meetings</li> <li>• Advisory board or advisory committee meetings</li> </ul>	<p>Permanently, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(4)</a> and <a href="#">270.31a-2(a)(1)</a></p>
<p>Vouchers, memoranda, correspondence, checkbooks, bank statements, cancelled checks, cash reconciliations, cancelled stock certificates, and all schedules evidencing and supporting each computation of net asset value of the investment company shares</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-2(a)(2)</a>]</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R § 270.31a-2(a)(2)</a></p>
<p>A record of each brokerage order given by or on behalf of the investment company for, or in connection with, the purchase or sale of securities</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-1(b)(5)</a>]</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(5)</a> and <a href="#">270.31a-2(a)(2)</a></p>
<p>A record of all other portfolio purchases or sales showing details comparable to those prescribed in <a href="#">17 C.F.R. § 270.31a-1(b)(5)</a></p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(6)</a> and <a href="#">270.31a-2(a)(2)</a></p>
<p>Record of all puts, calls, spreads, straddles, and other options in which the investment company has any interest or which the investment company has granted or guaranteed, and record of any contractual commitments to purchase,</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(7)</a> and <a href="#">270.31a-2(a)(2)</a></p>

<p>sell, receive, or deliver securities or other property</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-1(b)(7)</a>]</p>		
<p>Records with proof of money balances in all ledger accounts in the form of trial balances prepared at least once a month</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(8)</a> and <a href="#">270.31a-2(a)(2)</a></p>
<p>Records for each fiscal quarter</p> <p>[For a detailed explanation of what must be included in these records, see <a href="#">17 C.F.R. § 270.31a-1(b)(9)</a>]</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(9)</a> and <a href="#">270.31a-2(a)(2)</a></p>
<p>Records in the form of an appropriate memorandum identifying the entities authorizing the purchase or sale of portfolio securities</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-1(b)(10)</a>]</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(10)</a> and <a href="#">270.31a-2(a)(2)</a></p>
<p>All advisory material received from the investment adviser, any advisory board or advisory committee, or any other persons from whom the investment company accepts investment advice, other than material which is furnished solely through uniform publications distributed generally</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R §§ 270.31a-1(b)(11)</a> and <a href="#">270.31a-2(a)(2)</a></p>
<p>Until April 1, 2019, for registered investment companies subject to <a href="#">17 C.F.R. §270.30b1-9</a>, monthly portfolio holdings reports that would normally need to be included in Form N-PORT (<a href="#">17 C.F.R. § 274.150</a>)</p>	<p>6 years from the end of the fiscal year in which transactions occurred, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R. § 270.30b1-9(T)</a>; <a href="#">17 C.F.R. § 270.30b1-9</a>; <a href="#">17 C.F.R § 270.31a-2(a)(2)</a></p>
<p>Any advertisement, pamphlet, circular, form letter, or other sales literature addressed to or intended for distribution to prospective investors</p>	<p>6 years from the end of the fiscal year last used, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R § 270.31a-2(a)(3)</a></p>
<p>Any record of the initial determination that a director is not an interested person of the investment company, and each subsequent determination that the director is not an interested person of the investment company</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 270.31a-2(a)(4)</a>]</p>	<p>6 years, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R § 270.31a-2(a)(4)</a></p>
<p>Any materials used by the disinterested directors of an investment company to determine that a person who is acting as</p>	<p>6 years, the first 2 years in an easily accessible place</p>	<p><a href="#">17 C.F.R § 270.31a-2(a)(5)</a></p>

legal counsel to those directors is an independent legal counsel		
Any documents or other written information considered by the directors of the investment company in approving the terms or renewal of a contract or agreement between the company and an investment adviser	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R § 270.31a-2(a)(6)</a> and <a href="#">15 U.S.C. § 80a-15(c)</a>
The same records required to be maintained by brokers and dealers under section 17 of the Securities Exchange Act of 1934, to the extent those records are necessary or appropriate to record transactions  [Applicable to depositors and principal underwriters for any registered investment company other than a closed-end company]	6 years	<a href="#">17 C.F.R § 270.31a-2(c)</a>
Copies of the procedures and modifications to those procedures described in <a href="#">17 C.F.R. § 270.10f-3(c)(10)(i)</a> and (ii)	Permanently in an easily accessible place	<a href="#">17 C.F.R. § 270.10f-3(c)(12)(i)</a>
Written record of each transaction described in <a href="#">17 C.F.R. § 270.10f-3</a> , setting forth from whom the securities were acquired, the identity of the underwriting syndicate's members, the terms of the transaction, and the information or materials on which the determination described in <a href="#">17 C.F.R. § 270.10f-3(c)(10)(iii)</a> was made	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 270.10f-3(c)(12)(ii)</a>
Copies of any plan, agreement, or report made under <a href="#">17 C.F.R. § 270.12b-1</a>  [Applicable to registered open-end management investment companies]	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 270.12b-1(f)</a>
Procedures and any modifications described in <a href="#">17 C.F.R. § 270.17a-7(e)</a>	Permanently in an easily accessible place	<a href="#">17 C.F.R. § 270.17a-7(g)</a>
Record of each transaction setting out: <ul style="list-style-type: none"> <li>• A description of the security purchased or sold</li> <li>• The identity of the person on the other side of the transaction</li> <li>• The terms of the purchase or sale transaction</li> <li>• The information or materials on which the determinations described in <a href="#">17 C.F.R. § 270.17a-7(e)(3)</a> were made</li> </ul>	6 years from the end of the fiscal year in which the transactions occurred, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 270.17a-7(g)</a>

Records that describe mergers and their terms	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 270.17a-8(a)(5)</a>
Copies of the procedures adopted by the investment company's board of directors described in <a href="#">17 C.F.R. § 270.17e-1(b)(1)</a>	Permanently in an easily accessible place	<a href="#">17 C.F.R. § 270.17e-1(d)(1)</a>
Record of each transaction setting out: <ul style="list-style-type: none"> <li>The amount and source of the commission, fee, or other remuneration received or to be received</li> <li>The identity of the person acting as broker</li> <li>The terms of the transaction</li> <li>The information or materials on which the findings described in <a href="#">17 C.F.R. § 270.17e-1(b)(3)</a> were made</li> </ul>	6 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 270.17e-1(d)(2)</a>
Serially numbered notations of deposits, withdrawals, orders of withdrawals, and deliveries of securities and all other records specified in <a href="#">17 C.F.R. § 270.17f-2(e)</a>	1 year	<a href="#">17 C.F.R. § 270.17f-2</a>

#### SEC Record Retention Schedule - Investment Advisers

RECORD	RETENTION PERIOD
Accounts, books, and other documents that must be maintained under the registered investment advisers rule adopted under section 204 of the Investment Advisers Act of 1940  [Applicable to investment advisers that are majority-owned subsidiaries of registered investment companies]	Unspecified
Accounts, books, and other documents required to be maintained by registered investment advisers by rule adopted under section 204 of the Investment Advisers Act of 1940, to the extent those records are necessary or appropriate to record a person's transactions with the registered investment company  [Applicable to investment advisers that are <b>not</b> majority-owned subsidiaries of registered investment companies]	6 years
A journal or journals including cash receipts and disbursements, records, and any other records of original entry forming the basis of entries in any ledger  [Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
General and auxiliary ledgers (or other comparable records) reflecting asset, liability, reserve, capital, income, and expense accounts	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser

<p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	
<p>Memoranda of each order given by the investment adviser for the purchase or sale of any security, of any instruction received by the investment adviser concerning the purchase, sale, receipt, or delivery of a particular security, and of any modification or cancellation of any order or instruction</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Check books, bank statements, cancelled checks, and cash reconciliations of the investment adviser</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Bills or statements relating to the business of the investment adviser</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Trial balances, financial statements, and internal audit working papers</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Original written communications received and copies of written communications sent, as specified in 17 C.F.R. § 275.204-2(a)(7)</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>A list or other record of all accounts in which the investment adviser is vested with discretionary power for the funds, securities, or transactions of any client</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Powers of attorney and other grants of any discretionary authority by any client to the investment adviser</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Written agreements between the investment adviser and its clients</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Advertisements and press releases as specified in 17 C.F.R. § 275.204-2(a)(11)</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the investment adviser last published or disseminated the documents, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>A copy of the investment adviser's code of ethics under 17 C.F.R. § 275.204A-1 that is in effect, or has been in effect any time within the past five years, and records of written acknowledgements of the code of ethics</p>	<p>5 years</p>

<p>for each person supervised by the investment adviser currently or within the past five years</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	
<p>Records of any violation of the code of ethics, and any action taken because of the violation</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Records of each report made by an access person under 17 C.F.R. § 275.204A–1(b), including any information provided under paragraph (b)(3)(iii) in lieu of reports</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Records of the names of persons who are currently, or within the past five years were, access persons of the investment adviser</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years</p>
<p>Records of any decision, and the reasons supporting the decision, to approve the acquisition of securities by access persons under 17 C.F.R. § 275.204A–1(c)</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years after the end of the fiscal year in which approval is granted</p>
<p>Records of brochures, each amendment, and each supplement to brochures, that satisfy the requirements of Part 2 of Form ADV [17 C.F.R. § 279.1], summaries of material changes that satisfy the requires of Part 2 of Form ADV but are not contained in the brochure, and a record of dates that each brochure, supplement, amendment, and summary of material changes was given to any client or prospective client who then becomes a client. computation of managed assets, and memoranda describing legal or disciplinary events, as specified in 17 C.F.R. § 275.204-2(a)(13)</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Documentation describing the method used to compute managed assets for purposes of Item 4.E of Part 2A of Form ADV, if the method differs from the method used to compute regulatory assets under management in Item 5.F of Part 1A of Form ADV.</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Memoranda describing any legal or disciplinary event listed in Item 9 of Part 2A or Item 3 of Part 2B (Disciplinary Information) of Form ADV and presumed to be material, if the event involved the investment adviser or any of its supervised persons and is not disclosed in the brochure or brochure supplement described in 17 C.F.R. § 275.204-2(a)(14)(i).</p> <p>[For a detailed explanation, see 17 C.F.R. § 275.204-2(a)(14)(iii)]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>

<p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	
<p>All written acknowledgments of receipt obtained from clients under 17 C.F.R. § 275.206(4)-3(a)(2)(iii)(B) and copies of the disclosure documents delivered to clients by solicitors under 17 C.F.R. § 275.206(4)-3</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Accounts, books, internal working papers, and any other records or documents that are necessary to form the basis for or demonstrate the calculation of the performance or rate of return of any or all managed accounts or securities recommendations in any notice, circular, advertisement, newspaper article, investment letter, bulletin, or other communication that the investment adviser circulates or distributes, directly or indirectly, to 10 or more persons</p> <p>[For a detailed explanation, see 17 C.F.R. § 275.204-2(a)(16)]</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the investment adviser last published or disseminated the documents, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>A copy of the investment adviser's policies and procedures formulated under 17 C.F.R. §275.206(4)-7(a) that are in effect, or were in effect at any time within the past five years</p> <p>[For a detailed explanation, see 17 C.F.R. § 275.204-2(a)(17)]</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years</p>
<p>Records documenting the investment adviser's annual review of policies and procedures under 17 C.F.R. § 275.206(4)-7(b) and copies of any internal control report obtained or received under 17 C.F.R. § 275. 206(4)-2(a)(6)(ii)</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>Books and records as specified in 17 C.F.R. § 275.204-2(a)(18)</p> <p>[Applicable to all investment advisers that must be registered under 15 U.S.C. § 80b-3]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>For investment advisers who have custody or possession of securities or funds of any client, journals or other records showing all purchases, sales, receipts, and deliveries of securities, including certificate numbers, and credits to any such client account</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>For investment advisers who have custody or possession of securities or funds of any client, separate ledger accounts for each such client showing all purchases, sales, receipts, and deliveries of securities, the date and price of each purchase and sale, and all debits and credits</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>For investment advisers who have custody or possession of securities or funds of any client, copies of confirmations of all transactions effected by or for any such client account</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>
<p>For investment advisers who have custody or possession of securities or</p>	<p>5 years from the end of the fiscal year during which the last entry was</p>

funds of any client, records for each security in which any such client has a position, which must show the name of each such client having an interest in the security, the amount of interest, and the location of the security	made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
For investment advisers who have custody or possession of securities or funds of any client, memoranda describing the basis of the investment adviser's determination that the presumption that any related person is not operationally independent under 17 C.F.R. § 275.206(4)-2(d)(5) has been overcome	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
For investment advisers who render investment supervisory or management services to any client, records showing separately for each such client the securities purchased and sold, and the date, amount, and price of each purchase and sale	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
For investment advisers who render investment supervisory or management services to any client, for each security in which a client has a current position, information from which the investment adviser can promptly furnish the name of each client and the amount or interest of such client	For the duration in which a client holds a current position
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, copies of all policies and procedures required by § 275.206(4)-6	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, a copy of each proxy statement that the investment adviser receives regarding client securities.  [For a detailed explanation, see 17 C.F.R. § 275.204-2(c)(2)(ii)]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, records of each vote cast by the investment adviser on behalf of a client.  [For a detailed explanation, see 17 C.F.R. § 275.204-2(c)(2)(iii)]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, copies of any document created by the adviser that was material to making a decision how to vote proxies on behalf of a client or that memorializes the basis for that decision	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, copies of each written client request for information on how the adviser voted proxies on behalf of the client, and a copy of any written response by the investment adviser to any written or oral client request for information on how the adviser voted proxies on behalf of the requesting client	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser
Partnership articles and any amendments to partnership articles, articles of incorporation, charters, minute books, and stock certificate books of the investment adviser and of any predecessor	Permanently in the principal office of the investment adviser, and preserved 3 years after termination of the enterprise



## SEC RECORD RETENTION SCHEDULE - INVESTMENT ADVISERS

The following version of the SEC-specific record retention schedule for investment advisers includes a third column to indicate the regulations that cover each type of records. This third column does not need to be part of a document retention policy.

RECORD	RETENTION PERIOD	REASON
Accounts, books, and other documents that must be maintained under the registered investment advisers rule adopted under section 204 of the Investment Advisers Act of 1940  [Applicable to investment advisers that are majority-owned subsidiaries of registered investment companies]	Unspecified	<a href="#">17 C.F.R. §§ 270.31a-1(e) and 270.31a-2(d)</a>
Accounts, books, and other documents required to be maintained by registered investment advisers by rule adopted under section 204 of the Investment Advisers Act of 1940, to the extent those records are necessary or appropriate to record a person's transactions with the registered investment company  [Applicable to investment advisers that are <b>not</b> majority-owned subsidiaries of registered investment companies]	6 years	<a href="#">17 C.F.R. §§ 270.31a-1(f) and 270.31a-2(e)</a>
A journal or journals including cash receipts and disbursements, records, and any other records of original entry forming the basis of entries in any ledger  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(a)(1), (e)(1)</a>
General and auxiliary ledgers (or other comparable records) reflecting asset, liability, reserve, capital, income, and expense accounts  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. §§ 275.204-2(a)(2), (e)(1)</a>
Memoranda of each order given by the investment adviser for the purchase or sale of any security, of any instruction received by the investment adviser concerning the purchase, sale, receipt, or delivery of a particular security, and of any modification or cancellation of any order or instruction	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. §§ 275.204-2(a)(3), (e)(1)</a>

<p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>		
<p>Check books, bank statements, cancelled checks, and cash reconciliations of the investment adviser</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(4), (e)(1)</a></p>
<p>Bills or statements relating to the business of the investment adviser</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(5), (e)(1)</a></p>
<p>Trial balances, financial statements, and internal audit working papers</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(6), (e)(1)</a></p>
<p>Original written communications received and copies of written communications sent, as specified in <a href="#">17 C.F.R. § 275.204-2(a)(7)</a></p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(7), (e)(1)</a></p>
<p>A list or other record of all accounts in which the investment adviser is vested with discretionary power for the funds, securities, or transactions of any client</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(8), (e)(1)</a></p>
<p>Powers of attorney and other grants of any discretionary authority by any client to the investment adviser</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(9), (e)(1)</a></p>
<p>Written agreements between the investment adviser and its clients</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(10), (e)(1)</a></p>
<p>Advertisements and press releases as</p>	<p>5 years from the end of the fiscal year</p>	<p><a href="#">17 C.F.R. § 275.204-2(a)(11), (e)(3)(i)</a></p>

specified in <a href="#">17 C.F.R. § 275.204-2(a)(11)</a>  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	during which the investment adviser last published or disseminated the documents, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	
A copy of the investment adviser's code of ethics under <a href="#">17 C.F.R. § 275.204A-1</a> that is in effect, or has been in effect any time within the past five years, and records of written acknowledgements of the code of ethics for each person supervised by the investment adviser currently or within the past five years  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	5 years	<a href="#">17 C.F.R. §§ 275.204-2(a)(12)(i) and (iii), (e)(1)</a>
Records of any violation of the code of ethics, and any action taken because of the violation  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. §§ 275.204-2(a)(12)(ii), (e)(1)</a>
Records of each report made by an access person under <a href="#">17 C.F.R. § 275.204A-1(b)</a> , including any information provided under paragraph (b)(3)(iii) in lieu of reports  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. §§ 275.204-2(a)(13)(i), (e)(1)</a>
Records of the names of persons who are currently, or within the past five years were, access persons of the investment adviser  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	5 years	<a href="#">17 C.F.R. §§ 275.204-2(a)(13)(ii), (e)(1)</a>
Records of any decision, and the reasons supporting the decision, to approve the acquisition of securities by access persons under <a href="#">17 C.F.R. § 275.204A-1(c)</a>  [Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a> ]	5 years after the end of the fiscal year in which approval is granted	<a href="#">17 C.F.R. §§ 275.204-2(a)(13)(iii), (e)(1)</a>
Records of brochures, each amendment, and each supplement to brochures, that satisfy the requirements of Part 2 of Form ADV [ <a href="#">17 C.F.R. § 279.1</a> ], summaries of	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place,	<a href="#">17 C.F.R. §§ 275.204-2(a)(14)(i), (e)(1)</a>

<p>material changes that satisfy the requires of Part 2 of Form ADV but are not contained in the brochure, and a record of dates that each brochure, supplement, amendment, and summary of material changes was given to any client or prospective client who then becomes a client. computation of managed assets, and memoranda describing legal or disciplinary events, as specified in <a href="#">17 C.F.R. § 275.204-2(a)(13)</a></p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>the first 2 years in an appropriate office of the investment adviser</p>	
<p>Documentation describing the method used to compute managed assets for purposes of Item 4.E of Part 2A of Form ADV, if the method differs from the method used to compute regulatory assets under management in Item 5.F of Part 1A of Form ADV.</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(14)(ii), (e)(1)</a></p>
<p>Memoranda describing any legal or disciplinary event listed in Item 9 of Part 2A or Item 3 of Part 2B (Disciplinary Information) of Form ADV and presumed to be material, if the event involved the investment adviser or any of its supervised persons and is not disclosed in the brochure or brochure supplement described in <a href="#">17 C.F.R. § 275.204-2(a)(14)(i)</a>.</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 275.204-2(a)(14)(iii)</a>]</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(14)(iii), (e)(1)</a></p>
<p>All written acknowledgments of receipt obtained from clients under <a href="#">17 C.F.R. § 275.206(4)-3(a)(2)(iii)(B)</a> and copies of the disclosure documents delivered to clients by solicitors under <a href="#">17 C.F.R. § 275.206(4)-3</a></p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(15), (e)(1)</a></p>
<p>Accounts, books, internal working papers,</p>	<p>5 years from the end of the fiscal year</p>	<p><a href="#">17 C.F.R. § 275.204-2(a)(16), (e)(3)(i)</a></p>

<p>and any other records or documents that are necessary to form the basis for or demonstrate the calculation of the performance or rate of return of any or all managed accounts or securities recommendations in any notice, circular, advertisement, newspaper article, investment letter, bulletin, or other communication that the investment adviser circulates or distributes, directly or indirectly, to 10 or more persons</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 275.204-2(a)(16)</a>]</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>during which the investment adviser last published or disseminated the documents, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	
<p>A copy of the investment adviser's policies and procedures formulated under <a href="#">17 C.F.R. §275.206(4)-7(a)</a> that are in effect, or were in effect at any time within the past five years</p> <p>[For a detailed explanation, see <a href="#">17 C.F.R. § 275.204-2(a)(17)</a>]</p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(17)(i), (e)(1)</a></p>
<p>Records documenting the investment adviser's annual review of policies and procedures under <a href="#">17 C.F.R. § 275.206(4)-7(b)</a> and copies of any internal control report obtained or received under <a href="#">17 C.F.R. § 275.206(4)-2(a)(6)(ii)</a></p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. §§ 275.204-2(a)(17)(ii) and (iii), (e)(1)</a></p>
<p>Books and records as specified in <a href="#">17 C.F.R. § 275.204-2(a)(18)</a></p> <p>[Applicable to all investment advisers that must be registered under <a href="#">15 U.S.C. § 80b-3</a>]</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. § 275.204-2(a)(18), (e)(1)</a></p>
<p>For investment advisers who have custody or possession of securities or funds of any client, journals or other records showing all purchases, sales, receipts, and deliveries of securities, including certificate numbers, and credits to any such client account</p>	<p>5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser</p>	<p><a href="#">17 C.F.R. § 275.204-2(b)(1), (e)(1)</a></p>

For investment advisers who have custody or possession of securities or funds of any client, separate ledger accounts for each such client showing all purchases, sales, receipts, and deliveries of securities, the date and price of each purchase and sale, and all debits and credits	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(b)(2), (e)(1)</a>
For investment advisers who have custody or possession of securities or funds of any client, copies of confirmations of all transactions effected by or for any such client account	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(b)(3), (e)(1)</a>
For investment advisers who have custody or possession of securities or funds of any client, records for each security in which any such client has a position, which must show the name of each such client having an interest in the security, the amount of interest, and the location of the security	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(b)(4), (e)(1)</a>
For investment advisers who have custody or possession of securities or funds of any client, memoranda describing the basis of the investment adviser's determination that the presumption that any related person is not operationally independent under <a href="#">17 C.F.R. § 275.206(4)-2(d)(5)</a> has been overcome	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(b)(5), (e)(1)</a>
For investment advisers who render investment supervisory or management services to any client, records showing separately for each such client the securities purchased and sold, and the date, amount, and price of each purchase and sale	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(c)(1)(i), (e)(1)</a>
For investment advisers who render investment supervisory or management services to any client, for each security in which a client has a current position, information from which the investment adviser can promptly furnish the name of each client and the amount or interest of such client	For the duration in which a client holds a current position	<a href="#">17 C.F.R. § 275.204-2(c)(1)(ii), (e)(1)</a>
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, copies of all policies and procedures required by <a href="#">§ 275.206(4)-6</a>	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(c)(2)(i), (e)(1)</a>

For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, a copy of each proxy statement that the investment adviser receives regarding client securities.  [For a detailed explanation, see <a href="#">17 C.F.R. § 275.204-2(c)(2)(ii)</a> ]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(c)(2)(ii), (e)(1)</a>
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, records of each vote cast by the investment adviser on behalf of a client.  [For a detailed explanation, see <a href="#">17 C.F.R. § 275.204-2(c)(2)(iii)</a> ]	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(c)(2)(iii), (e)(1)</a>
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, copies of any document created by the adviser that was material to making a decision how to vote proxies on behalf of a client or that memorializes the basis for that decision	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(c)(2)(iv), (e)(1)</a>
For investment advisers who render investment supervisory or management services to any client and exercise voting authority with respect to such client securities, copies of each written client request for information on how the adviser voted proxies on behalf of the client, and a copy of any written response by the investment adviser to any written or oral client request for information on how the adviser voted proxies on behalf of the requesting client	5 years from the end of the fiscal year during which the last entry was made on the record, in an easily accessible place, the first 2 years in an appropriate office of the investment adviser	<a href="#">17 C.F.R. § 275.204-2(c)(2)(v), (e)(1)</a>
Partnership articles and any amendments to partnership articles, articles of incorporation, charters, minute books, and stock certificate books of the investment adviser and of any predecessor	Permanently in the principal office of the investment adviser, and preserved 3 years after termination of the enterprise.	<a href="#">17 C.F.R. § 275.204-2(e)(2)</a>

#### SEC Record Retention Schedule - Transfer Agents

RECORD	RETENTION PERIOD
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Receipts, tickets, schedules, logs, or other records showing the business day each routine item and each non-routine item is received from the presenter and made available to the presenter, and all other documents required under 17 C.F.R. § 240.17Ad-6  [Applicable to registered transfer agents]	Varying by record type [see 17 C.F.R. § 240.17Ad-7]
Accountant's reports and any documents required under 17 C.F.R. § 240.17Ad-13(b)  [Applicable to registered transfer agents]	3 years, the first year in an easily accessible place
Transfer agents standards and procedures, as specified in 17 C.F.R. § 240.17Ad-15(c)  [Applicable to registered transfer agents]	Unspecified
Records of transfers rejected including the reason for the rejection, who the guarantor was, and whether the guarantor failed to meet the transfer agent's guarantee standards  [Applicable to registered transfer agents]	3 years following the date of rejection
A master security holder file and subsidiary files  [Applicable to recordkeeping transfer agents]	Unspecified
Control books for each issue of securities  [Applicable to recordkeeping transfer agents]	Unspecified
Record of all certificate detail deleted from the master security holder  [Applicable to recordkeeping transfer agents]	6 years from the date of deletion.

## SEC RECORD RETENTION SCHEDULE - TRANSFER AGENTS

The following version of the SEC-specific record retention schedule for transfer agents includes a third column to indicate the regulations that cover each type of records. This third column does not need to be part of a document retention policy.

RECORD	RETENTION PERIOD	REASON
Receipts, tickets, schedules, logs, or other records showing the business day each routine item and each non-routine item is received from the presenter and made available to the presenter, and all other documents required under <a href="#">17 C.F.R. § 240.17Ad-6</a>  [Applicable to registered transfer agents]	Varying by record type [see <a href="#">17 C.F.R. § 240.17Ad-7</a> ]	<a href="#">17 C.F.R. § 240.17Ad-6</a>
Accountant's reports and any documents required under <a href="#">17 C.F.R. § 240.17Ad-13(b)</a>  [Applicable to registered transfer agents]	3 years, the first year in an easily accessible place	<a href="#">17 C.F.R. § 240.17Ad-13(c)</a>
Transfer agents standards and	Unspecified	<a href="#">17 C.F.R. § 240.17Ad-15(e)(1)</a>



procedures, as specified in <a href="#">17 C.F.R. § 240.17Ad-15(c)</a>		
[Applicable to registered transfer agents]		
Records of transfers rejected including the reason for the rejection, who the guarantor was, and whether the guarantor failed to meet the transfer agent's guarantee standards	3 years following the date of the rejection	<a href="#">17 C.F.R. § 240.17Ad-15(e)(3)</a>
[Applicable to registered transfer agents]		
A master security holder file and subsidiary files	Unspecified	<a href="#">17 C.F.R. § 240.17Ad-10(b)</a>
[Applicable to recordkeeping transfer agents]		
Control books for each issue of securities	Unspecified	<a href="#">17 C.F.R. § 240.17Ad-10(e)</a>
[Applicable to recordkeeping transfer agents]		
Record of all certificate detail deleted from the master security holder	6 years from the date of deletion.	<a href="#">17 C.F.R. § 240.17Ad-10(f)</a>
[Applicable to recordkeeping transfer agents]		

#### SEC Record Retention Schedule – Requirements for Alternative Trading Systems

RECORD	RETENTION PERIOD
Records of subscribers to the alternative trading system, identifying any affiliation between the alternative trading system and the subscribers, including common directors, officers, or owners	3 years, the first 2 years in an easily accessible place
Daily summaries of trading in the alternative trading system, including: <ul style="list-style-type: none"> <li>• Securities for which transactions have been executed.</li> <li>• Transaction volume, expressed with respect to equity securities in:               <ul style="list-style-type: none"> <li>• Number of trades;</li> <li>• Number of shares traded; and</li> <li>• Total settlement value in US Dollars.</li> </ul> </li> <li>• Transaction volume, expressed with respect to debt securities in number of trades and total US Dollar value.</li> </ul>	3 years, the first 2 years in an easily accessible place
Time-sequenced records of order information in the alternative trading system, described in <a href="#">17 C.F.R. § 242.302(c)</a>	3 years, the first 2 years in an easily accessible place
All notices provided by the alternative trading system to subscribers generally, as described in <a href="#">17 C.F.R § 242.303(a)(1)(ii)</a>	3 years, the first 2 years in an easily accessible place
At least one copy of the alternative trading system's standards for access to trading, all documents relevant to the alternative trading system's	3 years, the first 2 years in an easily accessible place

decision to grant, deny, or limit access to any person, and any other documents made or received by the alternative trading system to comply with 17 C.F.R. § 242.301(b)(5)	
[Applicable only to alternative trading systems subject to 17 C.F.R. § 242.301(b)(5)(ii)]	
At least one copy of all documents made or received by the alternative trading system to comply with 17 C.F.R. § 242.301(b)(6).	3 years, the first 2 years in an easily accessible place
At least one copy of written safeguards and written procedures to protect subscribers' confidential information, and written oversight procedures created to comply with 17 C.F.R. § 242.301(b)(10)	3 years, the first 2 years in an easily accessible place
All partnership articles or, for a corporation, all articles of incorporation or charter, minute books, and stock certificate books	The lifespan of the enterprise
Copies of reports filed under 17 C.F.R. §§ 242.301(b)(2) and 242.304), and records made under 17 C.F.R § 242.301(b)(5)	The lifespan of the enterprise

## SEC RECORD RETENTION SCHEDULE – REQUIREMENTS FOR ALTERNATIVE TRADING SYSTEMS

The following version of the SEC-specific record retention schedule for alternative trading systems includes a third column to indicate the regulations that cover each type of records. This third column does not need to be part of a document retention policy.

RECORD	RETENTION PERIOD	REASON
Records of subscribers to the alternative trading system, identifying any affiliation between the alternative trading system and the subscribers, including common directors, officers, or owners	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 242.302(a)</a> and <a href="#">242.303(a)(1)(i)</a>
Daily summaries of trading in the alternative trading system, including: <ul style="list-style-type: none"> <li>• Securities for which transactions have been executed.</li> <li>• Transaction volume, expressed with respect to equity securities in:               <ul style="list-style-type: none"> <li>• Number of trades;</li> <li>• Number of shares traded; and</li> <li>• Total settlement value in US Dollars.</li> </ul> </li> <li>• Transaction volume, expressed with respect to debt securities in number of trades and total US Dollar value.</li> </ul>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 242.302(b)</a> and <a href="#">242.303(a)(1)(i)</a>
Time-sequenced records of order information in the alternative trading system, described in <a href="#">17 C.F.R. § 242.302(c)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 242.302(c)</a> and <a href="#">242.303(a)(1)(i)</a>
All notices provided by the alternative trading system to subscribers generally,	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 242.303(a)(1)(ii)</a>

as described in <a href="#">17 C.F.R § 242.303(a)(1)(ii)</a>		
At least one copy of the alternative trading system's standards for access to trading, all documents relevant to the alternative trading system's decision to grant, deny, or limit access to any person, and any other documents made or received by the alternative trading system to comply with <a href="#">17 C.F.R. § 242.301(b)(5)</a>  [Applicable only to alternative trading systems subject to <a href="#">17 C.F.R. § 242.301(b)(5)(ii)</a> ]	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 242.303(a)(1)(iii)</a>
At least one copy of all documents made or received by the alternative trading system to comply with <a href="#">17 C.F.R. § 242.301(b)(6)</a> .	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 242.303(a)(1)(iv)</a>
At least one copy of written safeguards and written procedures to protect subscribers' confidential information, and written oversight procedures created to comply with <a href="#">17 C.F.R. § 242.301(b)(10)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 242.303(a)(1)(v)</a>
All partnership articles or, for a corporation, all articles of incorporation or charter, minute books, and stock certificate books	The lifespan of the enterprise	<a href="#">17 C.F.R. § 242.303(a)(2)(i)</a>
Copies of reports filed under <a href="#">17 C.F.R. §§ 242.301(b)(2)</a> and <a href="#">242.304</a> ), and records made under <a href="#">17 C.F.R § 242.301(b)(5)</a>	The lifespan of the enterprise	<a href="#">17 C.F.R. § 242.303(a)(2)(ii)</a>

#### SEC Record Retention Schedule - Other Entities and Generally Applicable Requirements

RECORD	RETENTION PERIOD
Reserve bank account computations under <a href="#">17 C.F.R. § 240.15c3-3(e)(3)</a>	3 years, the first 2 years in an easily accessible place
Written notification from each bank with which the broker or dealer maintains a Customer Reserve Bank Account, a PAB Reserve Bank Account, or a Special Account, as specified in <a href="#">17 C.F.R. § 240.15c3-3(f)</a>	3 years, the first 2 years in an easily accessible place
Records of computations on the basis of which the broker or dealer makes withdrawals from Customer Reserve Bank Accounts or PAB Reserve Bank Account, as specified in <a href="#">17 C.F.R. § 240.15c3-3(g)</a>	3 years, the first 2 years in an easily accessible place
For brokers or dealers subject to the requirements of <a href="#">17 C.F.R. § 240.15c3-3</a> with respect to physical possession or control of fully paid and excess margin securities, detailed descriptions of the procedures which the broker or dealer uses to comply with the possession and control requirements.	3 years, the first 2 years in an easily accessible place
For brokers or dealers holding securities futures products, the records	3 years, the first 2 years in an easily accessible place

required under 17 C.F.R. § 240.15c3-3(o)	
Records of extensions granted under 17 C.F.R. § 240.15c3-3(n) which should contain a summary of the justification for the granting of the extension  [Applicable to securities exchanges]	3 years
At least one copy of all documents, including all correspondence, memoranda, papers, books, notices, accounts, and other records that are made or received in the course of business and performing self-regulatory activity  [Applicable to every national securities exchange, national securities association, registered clearing agency, and the Municipal Securities Rulemaking Board]	5 years, the first 2 years in an easily accessible place
Records relating to stabilizing, syndicate covering transactions, and penalty bids, set out in 17 C.F.R. § 240.17a-2(c)  [Applicable to persons who affect any purchase of a security, who participate in a syndicate or group that engages in stabilizing the price of any security, or who affect a purchase that is a syndicate covering transaction or impose a penalty bid]	3 years, the first 2 years in an easily accessible place
Records of each extension and exemption granted  [Applicable to designated examining authorities]	5 years, the first 2 years in an easily accessible place
In relation to lost or stolen securities, forms X-17F-1A filed under 17 C.F.R. § 240.17f-1, all agreements between reporting institutions regarding registration or other aspects of 17 C.F.R. § 240.17f-1, and all confirmations or other information received from the SEC or its designee as a result of inquiry  [Applicable to reporting institutions (every national securities exchange, member of a national securities exchange, registered securities association, broker, dealer, municipal securities dealer, government securities broker, government securities dealer, registered transfer agent, registered clearing agency, participant in a registered clearing agency, member of the Federal Reserve System, and bank whose deposits are insured by the Federal Deposit Insurance Corporation)]	3 years in an easily accessible place
Records related to fingerprinting securities personnel, as specified under 17 C.F.R. § 240.17f-2(d)  [Applicable to members of national securities exchanges, brokers, dealers, registered transfer agents, and registered clearing agencies]	3 years after termination of the fingerprinted personnel
Reports regarding aged record differences, buy-ins, and failure to post certificate detail to master security holder and subsidiary files  [Applicable generally]	3 years, the first year in an easily accessible place
Notations of deposits, withdrawals, and deliveries of securities or similar investments, and all other records specified in 17 C.F.R. § 270.6e-2(v)  [Applicable to certain variable life insurance separate accounts]	1 year
Original or duplicate copies of books and records at the office of custodians or other offices located in the US, and all other records	Unspecified

required under 17 C.F.R. § 270.7d-1	
[Applicable to Canadian management investment companies requesting order permitting registration]	
The same accounts, books, and other documents required of brokers and dealers under Section 17 of the Securities and Exchange Act of 1934, insofar as those records are needed to record transactions with the registered investment company	Unspecified
[Applicable to depositors of and underwriters for registered investment companies]	
The same accounts, books, and other documents required of brokers and dealers under Section 17 of the Securities and Exchange Act of 1934	Unspecified
[Applicable to underwriters, brokers, and dealers which are majority-owned subsidiaries of registered investment companies]	

## SEC RECORD RETENTION SCHEDULE - OTHER ENTITIES AND GENERALLY APPLICABLE REQUIREMENTS

The following version of the SEC-specific record retention schedule for other entities includes a third column to indicate the regulations that cover each type of records. This third column does not need to be part of a document retention policy.

RECORD	RETENTION PERIOD	REASON
Reserve bank account computations under <a href="#">17 C.F.R. § 240.15c3-3(e)(3)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15c3-3(e)(3)(v)</a> and <a href="#">240.17a-4(b)(8)</a>
Written notification from each bank with which the broker or dealer maintains a Customer Reserve Bank Account, a PAB Reserve Bank Account, or a Special Account, as specified in <a href="#">17 C.F.R. § 240.15c3-3(f)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15c3-3(f)</a> and <a href="#">240.17a-4(b)(8)</a>
Records of computations on the basis of which the broker or dealer makes withdrawals from Customer Reserve Bank Accounts or PAB Reserve Bank Account, as specified in <a href="#">17 C.F.R. § 240.15c3-3(g)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15c3-3(g)</a> and <a href="#">240.17a-4(b)(8)</a>
For brokers or dealers subject to the requirements of <a href="#">17 C.F.R. § 240.15c3-3</a> with respect to physical possession or control of fully paid and excess margin securities, detailed descriptions of the procedures which the broker or dealer uses to comply with the possession and control requirements.	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15c3-3(d)(5)</a> and <a href="#">240.17a-4(b)(8)</a>
For brokers or dealers holding securities futures products, the records required under <a href="#">17 C.F.R. § 240.15c3-3(o)</a>	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. §§ 240.15c3-3(o)</a> and <a href="#">240.17a-4(b)(8)</a>

Records of extensions granted under <a href="#">17 C.F.R. § 240.15c3-3(n)</a> which should contain a summary of the justification for the granting of the extension  [Applicable to securities exchanges]	3 years	<a href="#">17 C.F.R. § 240.15c3-3(n)</a>
At least one copy of all documents, including all correspondence, memoranda, papers, books, notices, accounts, and other records that are made or received in the course of business and performing self-regulatory activity  [Applicable to every national securities exchange, national securities association, registered clearing agency, and the Municipal Securities Rulemaking Board]	5 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 240.17a-1</a>
Records relating to stabilizing, syndicate covering transactions, and penalty bids, set out in <a href="#">17 C.F.R. § 240.17a-2(c)</a>  [Applicable to persons who affect any purchase of a security, who participate in a syndicate or group that engages in stabilizing the price of any security, or who affect a purchase that is a syndicate covering transaction or impose a penalty bid]	3 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 240.17a-2(c)</a>
Records of each extension and exemption granted  [Applicable to designated examining authorities]	5 years, the first 2 years in an easily accessible place	<a href="#">17 C.F.R. § 240.17a-5(m)(1)</a> ; <a href="#">17 C.F.R. § 240.17a-1</a>
In relation to lost or stolen securities, forms X-17F-1A filed under <a href="#">17 C.F.R. § 240.17f-1</a> , all agreements between reporting institutions regarding registration or other aspects of <a href="#">17 C.F.R. § 240.17f-1</a> , and all confirmations or other information received from the SEC or its designee as a result of inquiry  [Applicable to reporting institutions (every national securities exchange, member of a national securities exchange, registered securities association, broker, dealer, municipal securities dealer, government securities broker, government securities dealer, registered transfer agent, registered clearing agency, participant in a registered clearing agency, member of the Federal Reserve System, and bank	3 years in an easily accessible place	<a href="#">17 C.F.R. § 240.17f-1(g)</a>

whose deposits are insured by the Federal Deposit Insurance Corporation)]		
<p>Records related to fingerprinting securities personnel, as specified under <a href="#">17 C.F.R. § 240.17f-2(d)</a></p> <p>[Applicable to members of national securities exchanges, brokers, dealers, registered transfer agents, and registered clearing agencies]</p>	3 years after termination of the fingerprinted personnel	<a href="#">17 C.F.R. § 240.17f-2(d)</a>
<p>Reports regarding aged record differences, buy-ins, and failure to post certificate detail to master security holder and subsidiary files</p> <p>[Applicable generally]</p>	3 years, the first year in an easily accessible place	<a href="#">17 C.F.R. § 240.17Ad-11</a>
<p>Notations of deposits, withdrawals, and deliveries of securities or similar investments, and all other records specified in <a href="#">17 C.F.R. § 270.6e-2(v)</a></p> <p>[Applicable to certain variable life insurance separate accounts]</p>	1 year	<a href="#">17 C.F.R. § 270.6e-2</a>
<p>Original or duplicate copies of books and records at the office of custodians or other offices located in the US, and all other records required under <a href="#">17 C.F.R. § 270.7d-1</a></p> <p>[Applicable to Canadian management investment companies requesting order permitting registration]</p>	Unspecified	<a href="#">17 C.F.R. § 270.7d-1</a>
<p>The same accounts, books, and other documents required of brokers and dealers under Section 17 of the Securities and Exchange Act of 1934, insofar as those records are needed to record transactions with the registered investment company</p> <p>[Applicable to depositors of and underwriters for registered investment companies]</p>	Unspecified	<a href="#">17 C.F.R. §§ 270.31a-1(d) and 270.31a-2(c)</a>
<p>The same accounts, books, and other documents required of brokers and dealers under Section 17 of the Securities and Exchange Act of 1934</p> <p>[Applicable to underwriters, brokers, and dealers which are majority-owned subsidiaries of registered investment companies]</p>	Unspecified	<a href="#">17 C.F.R. §§ 270.31a-1(c) and 270.31a-2(b)</a>

**PRODUCTS**

PLC US Capital Markets & Corporate Governance, PLC US Corporate and Securities, PLC US Federal Litigation, PLC US Law Department, PLC US Securities Litigation & Enforcement

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