

Supervision Compliance Manager User Guide

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1 Introduction

FIS's Supervision Compliance Manager provides an operating framework that addresses compliance, surveillance and suitability needs of financial service organizations. Supervision Compliance Manager analyzes trade, account, position, client and rep data—along with third-party market data—to support review of transactions, accounts, client holdings and reps. This information is processed against a complex yet customizable set of rules for potential regulatory, compliance and suitability violations.

Based on FIS's powerful Synapse Engine, Supervision Compliance Manager provides batch transaction review and account monitoring. The product provides baseline compliance rules for a variety of product types such as mutual funds, equities, options, fixed income products, unit investment trusts, annuities, and life insurance products.

The intent of this user guide is to provide users with an overview of the functional operation and capabilities of the baseline product and the several modules of the Supervision Compliance Manager system.

Supervision Compliance Manager operates within the Compliance Suite Platform—which is an application environment that provides functionality common to all Compliance Suite applications.

This guide does not intend to describe features supported within the Compliance Suite Platform or the Adhoc reporting tool. Separate user guides are provided that include that information.

This guide also does not intend to describe the logic or parameter values of the alerts. A separate Alert Parameter document is provided that includes that information.

1.1 Product Composition

Supervision Compliance Manager is modularized so that each organization can contract for functionality according to its business needs.

The baseline product comprises the Trade Review module and the core infrastructure of the Home, Review, Reports, Inquire, Audit and Admin menus.

The add-on modules available for license include Account Review, Anti-Money-Laundering (AML), Rep Review, Portfolio Review and Audit.

Firms licensed for Account Review are entitled to the Periodic Account Review and Account Risk Ranking components. These components are organized under Review as Account Daily, Account Periodic and Account Rank.

Firms licensed for AML are entitled to the AML Summary and AML Activity components which are organized under Review.

Firms licensed for Rep Review are entitled to the Rep Review components found under Review and the Rep Inquire component found under Inquire.

Firms licensed for Portfolio Review are entitled to the Portfolio Rank and Portfolio Periodic components—which are found under Review—and the Portfolio Risk Score module.

Firms licensed for Audit are entitled to the Holdings, Holdings Detail, Activity, Activity Detail, Balances, and Balances Detail components organized under Audit.

Firms licensed for the Adhoc Reporting module are entitled to the Library, Queue, and Schedule components which are organized under Adhoc.



Additional user guides are provided for the Compliance Suite Platform Admin and the Adhoc module. In addition, the Compliance Suite Platform User Guide provides information about Case Management that is beyond the scope of this user guide.

A standard workflow process is available within each module for consistency and efficiency throughout the system.

2 General

Supervision Compliance Manager features a web-browser-based user interface that consists of screens that are accessible from menus and sub-menus that are available based on a user's entitlements and the firm's contracted application licenses. Each menu and associated sub-menu (as applicable) are described below:

- Review Provides access to the baseline Trade Review, Account Review, Rep Review and AML modules
 - Trade Summary: Included in the baseline product; provides summary information of all trades for trade review; from this sub-menu the user can review trades, view detail information about trades, and change the status of a case
 - Review Stats: Included in the baseline product; provides an overview of the severity of the issue(s) found on each item (i.e., Trade, Account, or Rep) when it was reviewed
 - Linking: Included in the baseline product; provides a workflow process by which links can be established between internal (i.e., brokerage or firm-maintained shell account) and external accounts (i.e., direct business)
 - Notes: Provides a means to add a free-form text note at the account or rep level
 - Account Daily: Included in Account Review; provides summary and detail information of accounts that met firm-defined risk conditions during the daily system analysis
 - Account Periodic: Included in Account Review; provides summary and detail information of accounts that met firm-defined risk conditions during the periodic system analysis
 - Account Rank: Included in Account Review; provides summary and detail information of all accounts that met the firm-defined risk conditions during the periodic (monthly) system analysis; multiple review periods are available
 - AML Summary: Included in AML; provides summary and detail information of all accounts that met the firm-defined risk conditions associated with the Anti-Money-Laundering alerts during the daily system analysis
 - AML Activity: Included in AML; provides a consolidated view of the transaction activity analyzed as part of AML alert processing; activity includes cash and deliver transactions
 - Rep Rank: Included in Rep Review; provides summary and detail information of all firm reps and the results of the periodic (monthly) system analysis; multiple review periods are available
 - Portfolio Periodic: Included in Portfolio Review; provides summary and detail information of portfolios of accounts that met firm-defined risk conditions during the periodic system analysis



- Portfolio Rank: Included in Portfolio Review; provides summary and detail information of all portfolios of accounts that met the firm-defined risk conditions during the periodic (monthly) system analysis; multiple review periods are available
- Audit Provides summary holdings and trading activity for all accounts—aggregated by firm-defined hierarchy
 - Holdings: Provides position information aggregated based on user entitlement within hierarchy; users can drill into each level of the hierarchy—including down to the individual account level
 - Holdings Detail: Provides position information at the account level based on user entitlement
 - Activity: Provides transaction information aggregated based on user entitlement within the hierarchy; users can view each level of the hierarchy—down to the account level
 - Activity Detail: Provides transaction information at the account level based on user entitlement
 - Balances: Provides balance information—including market value, equity, cash and margin balances—aggregated based on user entitlement within the hierarchy; users can drill into each level of the hierarchy—including down to the individual account level
 - Balances Detail: Provides balance information at the account level based on user entitlement
- Reports Included in the baseline product, this menu and its sub-menus allow users to generate reports for important statistical data related to trades
- Inquire Included with the Rep Review module, this menu includes Rep Inquire, which
 contains a consolidated, up-to-date look at each rep in the system; and Product Inquire,
 which provides visibility to product attributes including product risk and complexity
 indicators
- Adhoc This menu provides entitled users with the ability to create their own custom reports based on most of the data in the system.

To navigate the system, select a screen from a menu and—as applicable—sub-menu. On a selected screen, define one or more filter parameters according to desired search results. Click to retrieve the data and view the results. Information displayed on most screens can be printed or exported according to various file formats.

3 Review

Supervision Compliance Manager displays the results of trade reviews and related accounts and reps via review screens and related detail screens. Information can be filtered and sorted using various data points such as account type, product type, date ranges, and transaction detail according to user entitlement.

3.1 Trade Summary

The **Trade Summary** screen provides a consolidated view of all brokerage trading activity and direct-with-carrier/fund application business.



This screen—along with the corresponding sub-level screens—provides the reviewer with the information needed to review the transactions for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.

A green flag is displayed on trades that have passed the applicable, activated rules. A yellow or red flag is displayed on trades that met the criteria set within the activated rules depending on the aggregated score of the alert(s) that triggered for the trades.



3.1.1 Filtering Trade Summary

Trade Summary includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click ext to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide.*)





Trade Summary Filters

Below is the list of individual filters available on **Trade Summary** with related information.

Filter Name	Functionality
General	
Key	Filters for transactions by result key. Each processed review
	result record is assigned a unique key by the system.
Firm Key	Filters for transactions by line of business or sub-firm.

Account-Related Filters		
Account	Filters for transactions related to an account number.	
Open Date	Filters for transactions by the date that the related account was	
	opened; helpful for heightened supervision of new accounts.	
Name	Filters for transactions by account name.	
Tax ID	Filters for transactions in accounts by the primary account	
	holder's tax ID.	
Age	Filters for transactions in accounts by the primary account	
	holder's age.	
Time Horizon	Filters for transactions in accounts by the primary account	
	holder's investment time horizon.	
Citizenship	Filters for transactions in accounts by the primary account	
	holder's citizenship status.	
Country	Filters for transactions in accounts by the primary account	
	holder's country.	
Plan Type	Filters for transactions in accounts by qualified Account Plan	
	Type.	
Reg Type	Filters for transactions by account registration type.	
Disc Acct	Filters for transactions in accounts identified as discretionary. A	
	discretionary account is one in which the primary account holder	
	has given the registered representative discretion to place trades	
	without approval for each trade.	
Fee	Filters for transactions in accounts identified as fee based.	
Employee	Filters for transactions in accounts identified as employee	
	accounts.	
Managed	Filters for transactions in accounts identified as managed. A	
	managed account is one in which the primary account holder has	
	delegated to an account manager rights to trade in any security	
Managad Topo	that fits the investment profile of the account.	
Managed Type	Filters for transactions in accounts designated as managed by	
Risk	managed program type.	
RISK	Filters for transactions in accounts by the primary account	
Objective	holder's risk tolerance.	
Objective	Filters for transactions in accounts by the primary account	
Risk Rank	holder's investment objective at the time of the trade. Filters for transactions by the primary account holder's assigned	
NISK KAIIK	risk value (risk values are assigned and provided by each firm as	
	part of the nightly data feed).	
	part of the highlity data feed).	



Product/Transaction-Related Filters		
Product	Filters for transactions by product type.	
Sub Product	Filters for transactions by sub product type.	
Acct Type	Filters filter for transactions by account type (e.g. cash, margin,	
	short, other).	
Share Class	Filters for transactions by mutual fund share class.	
Primary Exch	Filters for transactions by the primary exchange on which the	
	security is traded as indicated on the master product information.	
Carrier	Filters for transactions by fund family or insurance carrier.	
Source	Filters for transactions by their back-office source (i.e. the	
	application process; or the back-office clearing firm, such as	
CUSIP	Pershing, NFS, or NSCC).	
Symbol	Filters for transactions by CUSIP.	
Manager Trade	Filters for transactions by ticker symbol.	
B/S	Filters for transactions that were executed by org unit managers. Filters for buy or sell transactions. Select Other to filter for non-	
5/3	buy/sell transactions such as VA/VUL re-balances.	
Trans Source	Filters for transactions by their back-office transaction source	
	code (e.g. Purchase, Sale).	
Solicited	Filters for transactions that are identified as solicited. Solicited	
	accounts are those in which the primary account holder was	
	recommended by the account rep to pursue.	
Disc Used	Filters for transactions by whether discretion was used.	
	Discretion occurs when an account rep makes a decision on	
	behalf of the primary account holder when the primary account	
	holder has given discretion to the account rep on certain	
	securities.	
Cancelled	Filters on transactions identified as cancelled.	
Rebill	Filters on transactions that have been coded as <i>re-billed</i> . Re-bills	
	are typically associated with a prior trade cancellation and are the resulting trades submitted to replace cancelled trades.	
Replacement	Filters for transactions that are coded as	
Replacement	replacements/exchanges.	
P/A	Filters for transactions done as principal or agency transactions.	
Description	Filters for transactions by the name of the security.	
Markup	Filters for transactions by markup amount.	
Quantity	Filters for transactions by trade quantity.	
Price	Filters for transactions by price of the security on the trade.	
Net Amt	Filters for transactions by trade net amount.	
Principal Amt	Filters for transactions by principal amount (typically Quantity	
-	times Price).	
Commission	Filters for transactions by the commission amount on the trade.	
Commission %	Filters for transactions by amount of commission as a percentage	
	of the principal amount.	
Concession	Filters for transactions by the concession amount on the trade.	
Concession %	Filters for transactions by amount of concession as a percentage	
A a a a 4 A mark	of the principal amount.	
Asset Amt	Filters for transactions by asset value.	
CDSC	Filters for transactions by Contingent Deferred Sales Charge	
Order Type	(CDSC) amount.	
Order Type	Filters for transactions by type of order related to the trade.	



Result/Workflow-Related Filters		
Alert	Filters for transactions by alert ID. An alert is one or more rules in	
7	a group of rules known as a rule set.	
Sub-Alert	Filters for transactions by sub-alert. Sub-alerts are individual	
	rules within rule sets.	
Flag	Filters for transactions by severity. Red returns transactions of	
	high severity; yellow returns those of medium severity; and green	
	returns transactions that did not trigger any alerts. By selecting	
	Flagged, the system returns all transactions with a score greater	
	than zero (i.e., red and yellow).	
Submit Date	Filters for transactions by the date on which they were loaded into	
	the system.	
Status	Filters for transactions by trade review status.	
Resolution	Filters for transactions by the resolution of the case.	
Review Date	Filters for transactions by review date.	
Reviewer	Filters for transactions last reviewed by a particular user. Enter	
	the User ID of the user.	
Stop Assignment	Filters for the route stop to which the case is currently assigned.	
Trans Date	Filters for transactions by the trade date.	
Rule Count	Filters for transactions by the count of rules that triggered on the	
	result.	
Bulk Action ID	Filters for cases by the ID of the instance of a Bulk Action that	
1" 5 1 5"	added an action to the case.	
Hierarchy-Related Filters		
	ers allow a user to drill down to a specific level in the company's	
	y selecting from the drop-down list or by directly entering a unit or	
	t boxes. Only selections that fall into the user's hierarchy display in	
the drop-down boxes.		
Туре	Filters for transactions by the unit type or level of the executing	
	rep.	
Unit	Filters for transactions by the unit of the executing rep.	
Trader	Filters for transactions by executing rep. The rep can be	
	identified either by selecting the rep from the list or by entering	
	the rep code in the free-entry field.	
As	See FIS Compliance Suite Platform User Guide.	
Depth	See FIS Compliance Suite Platform User Guide.	
User	Filters for transactions by executing rep code for all rep codes	
	associated with the specified user key.	

3.2 Bulk Comment and Approval

For information on bulk functions such as bulk comment and bulk approval, see FIS Supervision Compliance Manager Bulk Workflows or FIS Compliance Suite Platform User Guide.

3.3 Trade Detail

The user can access the **Trade Detail** screen by clicking \(\bigcirc \) for any trade in the search results on **Trade Summary**.



Trade Detail displays a snapshot of the trade and the account at the time the trade was loaded into the system.

From **Trade Detail** the user may jump to a specific section by clicking on the Trade, Rep, Profile, Account, Balance, Calcs, Positions, History or Recommendation hyperlinks in the header section of the screen.

Below is a list of sections that are provided on Trade Detail:

- Alerts
- Case Actions
- Case Attachments
- Account Notes
- Trade
- Sub-Account Transactions
- Sub-Accounts
- Trade Daily
- Daily Household UIT
- Trade Rep
- Suitability Profile
- Client Experience
- Held Away Assets
- Missing Profile Information
- Account
- Recommendations
- · Related Accounts and Households
- Primary Address
- Balance
- Employee-Client Trading
- Switches
- Swaps
- Market Timing Exchanges
- Position Calcs
- Applicable Breakpoints
- Default Breakpoints
- Trade Calcs
- Positions
- Household Positions
- Trade History
- Related-Account Trade History
- Application
- Contract Being Surrendered/Replaced
- Application Calcs



- Disclosure
- Trade Rep
- Sub-Accounts
- Fund Selection
- Primary Applicant
- Primary Address
- Joint Applicant.

Some sections on **Trade Detail** are dynamically displayed based on the type of trade and violation being reviewed. For example, if the product type is mutual fund a section that includes Applicable Breakpoints is displayed. If the firm has defined households in the system a section containing the related account information is displayed. If the alert is a mutual fund switch alert a section containing the related switch transactions is displayed.

3.3.1 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered. (For more information on alerts, see FIS Compliance Suite Platform User Guide.)

3.3.2 Case Actions

This section displays the review history of a trade and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.3.3 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)

3.3.4 Account Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.

Adding Notes

To Add a Note, click Add, enter the note text, and click Save.

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role. (For more information on viewing notes, see **Notes**.)



3.3.5 Trade

This section displays detailed information about the trade transaction such as product, buy/sell, quantity, unit price, commission, trade date, rep, and security (among other details).

3.3.6 Sub-Account Transactions

This section displays any transactions associated with the sub-accounts related to a variable annuity transaction. Information displayed in this section includes name, security ID, side, quantity, price, and market value.

3.3.7 Sub-Accounts

This section displays information on sub-accounts related to the account holding the variable annuity product. Information displayed in this section includes name, security ID, quantity, objective, and standard deviation.

3.3.8 Trade Daily

This section displays information on trades that were executed in the same account on the same day in which the trade being reviewed was executed. Information displayed includes product type, buy/sell, quantity, price, principal amount, and solicited (among other details).

3.3.9 Daily Household UIT

This section displays information related to the UIT transactions in the account on the day of the current trade.

3.3.10 Trade Rep

This section displays detailed information about the rep(s) associated with the account. The information displayed includes user ID, name, phone number, email, licenses, any states in which the user is licensed, the unit of which the rep is a member, and the unit manager.

3.3.11 Suitability Profile

This section displays suitability information for the client and account to which the trade relates. The information displayed includes birth date, age, account risk tolerance, account investment objective, trading experience, income, and net worth (among other details). On older records, the client's current suitability profile is accessible via the link found at the top of the account detail page displayed as the account number.

3.3.12 Held Away Assets

This section displays information about assets in financial accounts that are held with other financial custodians beyond the visibility of this system.



3.3.13 Account

This section displays detailed information about the account for which the trade was performed. The information displayed includes account ID, shell ID, title, type of account, registration type, rep for the account, and open date (among other details). On older records, the current account information is accessible via the link found at the top of the account detail page displayed as the account number.

3.3.14 Recommendations

This section displays trade recommendations for the account provided by the account rep and also account/product purchase recommendations made by the account rep for the investor via a sales tool(s).

3.3.15 Related Accounts and Households

This section displays information about any accounts related to the account for which the trade was performed. These relationships are identified by the broker/dealer and generally refer to household relationships. The information displayed includes account ID, nature, and title (among other details).

3.3.16 Primary Address

This section displays the address for the primary account holder.

3.3.17 Balance

This section displays current account balance information. The information displayed includes asset amount, equity amount and cash market value (among other details).

3.3.18 Switches

This section displays the trades that were identified as potential violations of the firm's switching policy.

3.3.19 Swaps

This section displays the trades that were identified as potential violations of the firm's swapping policy.

3.3.20 Position Calcs

This section displays various summary calculations on account positions. The information includes total high-yield bond amount, total low-priced stock amount, and portfolio standard deviation (among other details).



3.3.21 Applicable Breakpoints

This section displays breakpoints of sale load rates that are applicable to the trade.

3.3.22 Default Breakpoints

This section displays the default breakpoints of sale load rates when no breakpoint schedule is available for the CUSIP associated with the trade.

3.3.23 Trade Calcs

This section displays summary amounts for the account and household by sponsor; and UIT related information.

3.3.24 Positions

This section displays information about positions that exist for an account. The information includes position name, product type, symbol, CUSIP, quantity, price, market value, account type, and position percent (i.e., of total). Separate tables are provided for each product type (e.g. equity, mutual fund, fixed income, etc.).

3.3.25 Household positions

This section displays information about positions in other accounts that are related to the trade account (i.e., household). The information includes position name, product type, symbol, CUSIP, quantity, price, market value, account type, account ID, and security ID. Household is defined by the firm.

3.3.26 Trade History

This section displays trading activity in the account for the 90 days prior to the trade date. The information includes date, product type, name, symbol, buy/sell, quantity, price, commission, rep, fund family, share class, account type, exchange, and solicited (among other details).

3.3.27 Related-Account Trade History

This section displays trading activity in related accounts for the 90 days or more (defined by the firm) prior to the trade date. The information includes date, product type, name, symbol, buy/sell, quantity, price, commission, rep, fund family, share class, account type, exchange, and solicited (among other details)

3.3.28 Sub-Accounts

This sections displays sub accounts related to the variable annuity transaction. Information displayed in this section includes name, security ID, quantity, objective, and standard deviation.



3.4 Review Statistics

The **Review Statistics** menu contains sub-menus for each of the review modules under the Review menu:

- Trade
- Account Daily
- Account Periodic
- Account Rank
- AML (Anti-Money-Laundering)
- Rep Rank.

Each of the screens provided by these sub-menus contains an overview of the severity of the issue(s) found on each item (i.e., Trade, Account, or Rep) when it was reviewed. In addition, it displays the current status of each review. The statistics display based on the role and hierarchy level of the user. These reports can be used as a supervision oversight tool—allowing supervisors to see aging statistics of managed issues from inception to resolution. The reports provide a wide range of filter options to help narrow the focus to specific categories of records.



Report Sections

Each report is broken into 4 sections. All statistics relate to the module and filter set selected.

Workflow Statistics – Open by Severity: This section shows the review statistics by severity for cases currently open:

- Count: the number of items that are currently open (sorted by severity)
- Percent: the percentage of items currently open (sorted by severity)
- Avg Age: the average number of days that the currently open items have been open (sorted by severity)
- Max Age: the maximum number of days that the currently open items have been open (sorted by severity)
- Avg Actions: the average number of review actions that have been taken on items (sorted by severity)
- Max Actions: the maximum number of review actions that have been taken on items (sorted by severity).

Workflow Statistics – Open by Status: - This section shows the workflow status aging statistics by current workflow status for cases currently open:

- Count: the number of items that are currently open (sorted by status)
- Percent: the percentage of items that are currently open (sorted by status)
- Avg Age: the average number of days that the currently open items have been open (sorted by status)



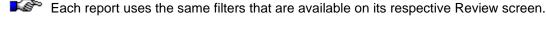
 Max Age: the maximum number of days that the currently open items have been open (sorted by status).

Workflow Statistics – Closed by Severity: This section shows the review statistics by severity for cases currently open:

- Count: shows the number of items that are currently closed (sorted by severity)
- Percent: shows the percentage of items currently closed (sorted by severity)
- Avg Age: shows the average number of days that the currently closed items have been closed (sorted by severity)
- Max Age: shows the maximum number of days that the currently closed items have been closed (sorted by severity)
- Avg Actions: shows the average number of review actions that have been taken on items (sorted by severity)
- Max Actions: shows the maximum number of review actions that have been taken on items (sorted by severity).

Workflow Statistics – Closed by Status: This section shows the workflow status aging statistics by current workflow status for cases currently open:

- Count: shows the number of items that are currently closed (sorted by status)
- Percent: shows the percentage of items that are currently closed (sorted by status)
- Avg Age: shows the average number of days that the currently closed items have been closed (sorted by status)
- Max Age: shows the maximum number of days that the currently closed items have been closed (sorted by status).



Notes on Module-Specific Statistics

Account Daily and Account Rank
Closed alerts may include alerts that

Closed alerts may include alerts that were closed automatically by the system when a specific account condition was resolved based on new account information. This is referred to as a self-clearing alert. Self-clearing alerts cover situations such as security concentration—for which it is possible for the concentration issue to be resolved based on the sell-out of a position.

Account Rank

The Severity statistics are based on whether the account was *Flagged* or *Elevated* & *Flagged*. Accounts are *Elevated* due to one or more criteria exceeding an alert's high threshold. Accounts are *Flagged* when the cumulative result score reaches a score threshold.

3.5 Account Linking

The **Account Linking** screen provides a workflow process by which links can be established between internal (i.e., brokerage or firm-maintained shell account) and external (i.e., direct business) accounts.

External Accounts display as filtered search results on **Account Linking**. Clicking navigates to the **Account Link Lookup** screen where the linking is performed. **Account Link Lookup** is organized into these sections:

- External Account
- Firm Account



- Linking History
- Account Lookup Filters
- Firm Accounts.

3.5.1 External Account

Displays details of the external account selected on **Account Linking**.

3.5.2 Firm Account

Displays details of the firm account linked to the external account. If no firm account is linked to the external account displayed in the external account section, the section displays no data values.

3.5.3 Linking History

Supports several user workflow functions including unlinking linked accounts and providing various linking dispositions and comments.

3.5.4 Account Lookup Filters

Provides filters for searching firm accounts from which to select an account to link to the external account displayed in the external account section.

3.5.5 Firm Accounts

Displays firm accounts returned from a filtered search using the account lookup filters. Clicking links the selected firm account to the external account displayed in the external account section.

3.6 Notes

The **Notes** screen provides the ability to view notes for accounts, reps and units.

Notes Filters

Below is the list of individual filters available on **Notes** with related information.

Filter Name	Functionality	
Account-Related Filters	Account-Related Filters	
Account	Filters for notes related to a specific account number.	
Open Date	Filters for notes by the date that the related account was opened. This is helpful for heightened supervision of new	
	accounts.	
Fee	Filters for notes in accounts identified as fee based.	
Plan	Filters for notes in accounts by qualified Account Plan Type.	



Managad	Filters for notes in accounts identified as managed. A managed
Managed	Filters for notes in accounts identified as managed. A managed
	account is one in which the primary account holder has
	delegated to an account manager rights to trade in any security
Citizenship	that fits the investment profile of the account. Filters for notes in accounts by the primary account holder's
Citizenship	citizenship status.
Country	Filters for notes in accounts by the primary account holder's
Country	country.
Name	Filters for notes by account name.
Tax ID	Filters for notes in accounts by the primary account holder's tax
Tux 15	ID.
Age	Filters for notes in accounts by the primary account holder's
7.90	age.
Time Horizon	Filters for notes in accounts by the primary account holder's
	investment time horizon.
Managed Type	Filters for notes in accounts designated as managed by
	managed program type.
Objective	Filters for notes in accounts by the primary account holder's
_	investment objective at the time of the trade.
Risk	Filters for notes in accounts by the primary account holder's risk
	tolerance.
Disc Acct	Filters for notes in accounts identified as discretionary. A
	discretionary account is one in which the primary account holder
	has given the registered representative discretion to place
	trades without approval for each trade.
Employee	Filters for notes in accounts identified as employee accounts.
Reg Type	Filters for notes by account registration type.
Risk Rank	Filters for notes by the primary account holder's assigned risk
	value. (Risk values are assigned and provided by each firm as
Note Deleted Filters	part of the nightly data feed).
Note-Related Filters	
Туре	Filters for notes by note type.
Entered By	Filters for notes by the user who entered the note.
Entry Date	Filters for notes by entry date. The date can be entered
Littly Date	Timers for flotes by entry date. The date can be entered
	manually by clicking and selecting the date from the
	calendar. To select a date range, select >i< or <=> from the
	drop-down box and then enter the start and end dates using the
	calendar. If only the first date is entered, the search returns
	notes entered from that date forward. Alternatively, select LIST
	from the operator drop-down and then select a date option from
Nata	the list.
Note	Filters for notes by note text.
Hierarchy-Related Filters	ow a upor to drill down to a appoific level in the company's
	ow a user to drill down to a specific level in the company's
	by selecting from the drop-down list or by directly entering a unit or the transfer of the tr
in the drop-down boxes.	at boxes. Only selections that fall lift the user's fileratory display
·	
Туре	Filters for notes by the unit type or level of the executing rep.
Unit	Filters for notes by the unit of the executing rep.



Trader	Filters for notes by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep code in the free-entry field.
As	See FIS Compliance Suite Platform User Guide.
Depth	See FIS Compliance Suite Platform User Guide.
User	Filters for notes by executing rep code for all rep codes associated with the specified user key.

3.7 Account Daily Summary

The **Account Daily Summary** screen provides a consolidated view of all accounts on which alerts triggered on the date indicated in the Submit Date column. A yellow flag displays on all accounts in the results.

This screen—along with the corresponding sub-level screens—supports the review of account violations for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.



Note: The daily review processing of Account Daily is discontinued. The Account Daily module is included in the release only for display of historical review results. The daily review of accounts is now supported by the Account Periodic module. (For more information on the features of the Account Periodic module, see Account Periodic Review Summary or Account Periodic Alert Summary.)

3.7.1 Reviewing Alerts

The daily account analysis process includes two types of alerts. A self-clearing alert is an alert for which the condition creating the alert may be corrected due to market conditions, balance changes, or other factors. If an alert is triggered and the condition is corrected during a subsequent review process, the alert may be cleared automatically by the system.

The second type of alert is an alert requiring manual review. This type is typically triggered by an event that is not changed by account activity. Examples include a profile change on the account and transaction activity such as journal, cash or deliver transactions. (The system does not automatically clear alerts of this type.)

Each self-clearing alert includes an aging parameter to allow the firm to specify the number of consecutive days on which the condition must exist for the alert to be presented to the user. For



example, if an aging parameter for the Margin alert is set to 3, the equity percentage must fall below the threshold for 3 consecutive days before the margin alert is displayed for user review. (See the Alert Parameter document for more detail on self-clearing alerts and aging parameters.)

3.7.2 Filtering Account Daily Summary

The **Account Daily Summary** screen includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)



Account Daily Summary Filters

Below is the list of individual filters available on **Account Daily Summary** with related information.

Filter Name	Functionality	
General		
Key	Filters for accounts by result key. Each processed review result	
	record is assigned a unique key by the system.	
Firm Key	Filters for accounts by line of business or sub-firm.	
Account-Related Filters		
Account	Filters for accounts by account number.	
Open Date	Filters for accounts by the date that the account was opened.	
	This is helpful for heightened supervision of new accounts.	
Time Horizon	Filters for accounts by the primary account holder's investment	
	time horizon.	
Employee	Filters for employee accounts.	
Age	Filters for accounts by the primary account holder's age.	
Name	Filters for accounts by account name.	
Tax ID	Filters for accounts by the primary account holder's tax ID.	
Citizenship	Filters for accounts by the primary account holder's citizenship	
	status.	
Country	Filters for accounts by the primary account holder's country.	
Fee	Filters for accounts identified as fee based.	
Disc Acct	Filters for accounts identified as discretionary. A discretionary	
	account is one in which the primary account holder has given	



	the registered representative discretion to place trades without approval for each trade.		
Risk			
KISK	Filters for accounts by the risk tolerance of the primary account holder.		
Dial. Danis			
Risk Rank	Filters for accounts related to clients with an assigned risk value.		
	(Risk values are assigned and provided by each firm as part of		
Objective	the nightly data feed).		
Objective	Filters for accounts by the primary account holder's investment		
Dian True	objective.		
Plan Type	Filters for accounts by qualified Account Plan Type.		
Reg Type	Filters for accounts by account registration type.		
Managed	Filters for accounts identified as managed. A managed account		
	is one in which the primary account holder has delegated to an		
	account manager rights to trade in any security that fits the		
	investment profile of the account.		
Managed Type	Filters for accounts designated as managed by managed		
	program type.		
Result/Workflow-Related Filt	ers		
Alaut	Filters for accounts by plant ID. An elect is one or more rules in		
Alert	Filters for accounts by alert ID. An alert is one or more rules in		
Ondo Alant	a group of rules known as a rule set.		
Sub-Alert	Filters for accounts by sub-alert. Sub-alerts are individual rules		
0	within rule sets.		
Score	Filters for accounts by alert score.		
Submit Date	Filters for accounts by the date on which they were loaded into		
	the system.		
Status	Filters for accounts by account review status.		
Resolution	Filters for accounts by the resolution of the case.		
Review Date	Filters for accounts by review date.		
Reviewer	Filters for accounts last reviewed by a particular user. Enter the		
	User ID of the user.		
Stop Assignment	Filters for the route stop to which the case is currently assigned.		
Hierarchy-Related Filters			
	The Type, Unit, and Trader allow a user to drill down to a specific level in the company's		
hierarchy. This can be done by selecting from the drop-down list or by directly entering a unit or			
rep number in the provided text boxes. Only selections that fall into the user's hierarchy display in			
the drop-down boxes.			
Туре	Filters for accounts by the unit type or level of the executing rep.		
Unit	Filters on accounts by the unit of the executing rep.		
Trader	Filters on accounts by executing rep. The rep can be identified		
114401	either by selecting the rep from the list or by entering the rep		
	code in the free-entry field.		
As	See FIS Compliance Suite Platform User Guide.		
	See FIS Compliance Suite Platform User Guide. See FIS Compliance Suite Platform User Guide.		
Depth			
User	Filters for accounts by rep code for all rep codes associated with		
	the specified user key.		

3.8 Account Daily Detail

All review results can be viewed in detail on the **Account Daily Detail** screen by clicking selected account in the search results on **Account Daily Summary**.



Account Daily Detail provides a snapshot of the account at the time the account was reviewed. It also provides a history of the review and allows the account to be assigned to another user for further review and action.

From **Account Daily Detail** the user may jump to a specific section by clicking on the Profile, Account, Balance, Positions or History hyperlinks in the header section of the screen.

Below is a list of sections that are provided on Account Daily Detail:

- Alerts
- Case Actions
- Case Attachments
- Account Notes
- Suppression History
- Related Review History
- Account Rep
- Suitability Profile
- Client Experience
- Held Away Assets
- Missing Profile Information
- Account Changes
- Account
- Balance
- Current Asset Mix
- Positions
- Trade History
- Transaction History.

3.8.1 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered. (For more information on alerts, see FIS Compliance Suite Platform User Guide.)

3.8.2 Case Actions

This section displays the review history of an account and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.8.1 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)



3.8.2 Account Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.

Adding Notes

To Add a Note, click Add, enter the note text, and click Save

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role. (For more information on viewing notes, see Notes.)

3.8.3 Suppression History

Alerts within **Account Daily** can be suppressed for a specified period of time. If an alert is suppressed, users are not notified again of the condition—regardless of whether the condition continues to be present—until the specified timeframe expires or the user manually removes the suppression rule.

In Suppression History, the user defines the suppression expiration date and can view the history of alert suppression.

To suppress an alert, click Add, select the alert (if more than one is present on the result), click and enter the suppression expiration date; then click Save.

This option is available only to users who are entitled to suppress alerts; however, all users can view suppression history.

To retire the suppression rule before the defined expiration date, click Expire. Suppression is then no longer in effect for the given alert.

The system administrator can limit the suppression timeframe according to firm policy.

No threshold override is supported for Account Daily alerts. The alert is suppressed until the expiration date—with no override for a re-firing of the alert.

3.8.4 Suitability Profile

This section displays suitability information for the client and account. The information displayed includes birth date, age, account risk tolerance, account investment objective, trading experience, income, and net worth (among other details). On older records, the client's current suitability profile is accessible via the link found at the top of the account detail page displayed as the account number.

3.8.5 Account

This section displays detailed information about the account. The information displayed includes account ID, shell ID, title, type of account, registration type, rep for the account, open date (among other details). On older records, the current account information is accessible via the link found at the top of the account detail page displayed as the account number.



3.8.6 Balance

This section displays current account balance information. The information displayed includes asset amount, equity amount and cash market value (among other details).

3.8.7 Positions

This section displays information about positions that exist for an account. The information includes position name, product type, symbol, CUSIP, quantity, price, market value, account type, and position percent (i.e., of total). Separate tables are provided for each product type (e.g. equity, mutual fund, fixed income, etc.)

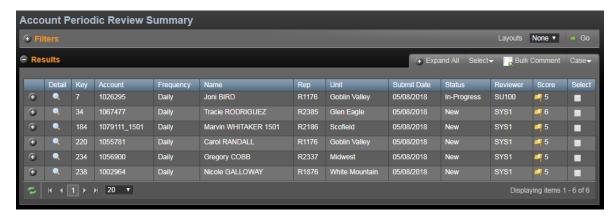
3.8.8 Trade History

This section displays trading activity in the account for the 90 days prior to the current ranking period date. The information includes date, product type, name, symbol, buy/sell, quantity, price, commission, rep, fund family, share class, account type, exchange, solicited, etc. for all transaction types (including cash and deliver transactions).

3.9 Account Periodic Review Summary

The **Account Periodic Review Summary** screen provides a consolidated view of all accounts on which alerts triggered on the date indicated in the Submit Date column. A yellow flag displays on all accounts in the results.

The Account Periodic review process is configured to execute on a daily, weekly, monthly, quarterly, or yearly basis based on the firm's preference.



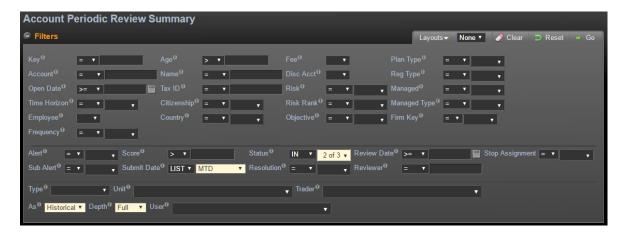
This screen—along with the corresponding sub-level screens—supports the review of account violations for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.

Clicking opens the **Account Periodic Detail** screen and displays additional information on the alert for the related account. (For more information on viewing account detail, see <u>Account Periodic Detail</u>.)



3.9.1 Filtering Account Periodic Review Summary

The **Account Periodic Review Summary** screen includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)



Account Periodic Review Summary Filters

Below is the list of individual filters available on **Account Periodic Review Summary** with related information.

Filter Name	Functionality
General	
Key	Filters for accounts by result key. Each processed review result
	record is assigned a unique key by the system.
Firm Key	Filters for accounts by line of business or sub-firm.
Account-Related Filters	
Account	Filters for accounts by account number.
Open Date	Filters for accounts by the date that the account was opened.
	This is helpful for heightened supervision of new accounts.
Time Horizon	Filters for accounts by the primary account holder's investment
	time horizon.
Employee	Filters for employee accounts.
Age	Filters for accounts by the primary account holder's age.
Name	Filters for accounts by account name.
Tax ID	Filters for accounts by the primary account holder's tax ID.
Citizenship	Filters for accounts by the primary account holder's citizenship
	status.
Country	Filters for accounts by the primary account holder's country.
Fee	Filters for accounts identified as fee based.
Disc Acct	Filters for accounts identified as discretionary. A discretionary
	account is one in which the primary account holder has given
	the registered representative discretion to place trades without
	approval for each trade.



Risk Rank Risk Rank Filters for accounts by the risk tolerance of the primary account holder. Filters for accounts related to clients with an assigned risk value. (Risk values are assigned and provided by each firm as part of the nightly data feed). Objective Filters for accounts by the primary account holder's investment objective.		
(Risk values are assigned and provided by each firm as part of the nightly data feed). Objective Filters for accounts by the primary account holder's investment objective.		
the nightly data feed). Objective Filters for accounts by the primary account holder's investment objective.		
Objective Filters for accounts by the primary account holder's investment objective.		
objective.		
Diese For accounts by available Account Diese Type		
PlanFilters for accounts by qualified Account Plan Type.		
Reg Type Filters for accounts by account registration type.		
Managed Filters for accounts identified as managed. A managed account		
is one in which the primary account holder has delegated to an		
account manager rights to trade in any security that fits the		
investment profile of the account.		
Managed Type Filters for accounts designated as managed by managed		
program type.		
Result/Workflow-Related Filters		
Frequency Filters for accounts by review process frequency.		
Alert Filters for accounts by alert ID. An alert is one or more rules in		
a group of rules known as a rule set.		
Sub-Alert Filters for accounts by sub-alert. Sub-alerts are individual rules		
within rule sets.		
Score Filters for accounts by alert score.		
Submit Date Filters for accounts by the date on which they were loaded into		
the system.		
Status Filters for accounts by account review status.		
Resolution Filters for accounts by the resolution of the case.		
Review Date Filters for accounts by review date.		
Reviewer Filters for accounts last reviewed by a particular user. Enter the		
User ID of the user.		
Stop Assignment Filters for the route stop to which the case is currently assigned.		
Hierarchy-Related Filters The Type, Unit, and Trader allow a user to drill down to a specific level in the company's hierarchy. This can be done by selecting from the drop-down list or by directly entering a unit or rep number in the provided text boxes. Only selections that fall into the user's hierarchy display in the drop-down boxes.		
Type Filters for accounts by the unit type or level of the executing rep.		
Unit Filters on accounts by the unit of the executing rep.		
Trader Filters on accounts by executing rep. The rep can be identified		
either by selecting the rep from the list or by entering the rep		
code in the free-entry field.		
As See FIS Compliance Suite Platform User Guide.		
Depth See FIS Compliance Suite Platform User Guide.		
User Filters for accounts by rep code for all rep codes associated with		
the specified user key.		

3.10 Account Periodic Detail

All review results can be viewed in detail on the **Account Periodic Detail** screen by clicking solution of a selected account in the search results on **Account Periodic Review Summary**.

Account Periodic Detail provides a snapshot of the account at the time the account was reviewed.



From **Account Periodic Detail** the user may jump to a specific section by clicking on the Profile, Account, Balance, Positions or History hyperlinks in the header section of the screen.

Below is a list of sections that are provided on Account Periodic Detail:

- Alerts
- Case Actions
- Case Attachments
- Account Notes
- Suppression History
- Overrides
- Account Rep
- Suitability Profile
- Client Experience
- Held Away Assets
- Missing Profile Information
- Account Changes
- Account
- Balance
- Current Asset Mix
- Positions
- Trade History
- Transaction History.

3.10.1 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered. (For more information on alerts, see FIS Compliance Suite Platform User Guide.)

3.10.2 Case Actions

This section displays the review history of an account and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.10.3 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)

3.10.4 Account Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.



Adding Notes

To Add a Note, click Add, enter the note text, and click Save.

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role. (For more information on viewing notes, see Notes.)

3.10.5 Suppression History

Alerts within **Account Periodic** can be suppressed for a specified period of time. If an alert is suppressed, users are not notified again of the condition—regardless of whether the condition continues to be present—until the specified timeframe expires or the user manually removes the suppression rule.

In Suppression History, the user defines the suppression expiration date and can view the history of alert suppression.

To suppress an alert, click Add , select the alert, click and enter the suppression expiration date; then click Save

This option is available only to users who are entitled to suppress alerts; however, all users can view suppression history.

To retire the suppression rule before the defined expiration date, click Expire. Suppression is then no longer in effect for the given alert.

The system administrator can limit the suppression timeframe according to firm policy.

3.10.6 Overrides

Qualifiers (i.e., parameters) applicable to certain alerts can be overridden for a given account so that alerts trigger based on qualifier override values instead of the standard qualifier values that are defined for the alerts. To add an alert qualifier override, click Add on the Overrides section header. In the section that is displayed titled Select Qualifier for Override, select an option from the Parameter drop-down. Note that only parameters that are relevant to the alert(s) that triggered on the account are displayed. Upon the selection of a parameter, the screen displays the information that is relevant to the qualifier and provides the option to enter an override value. When multiple rows are displayed, at least one must be selected to complete the action. Upon entry of the override value(s), click

Three types of overrides are provided by the system:

- Security: Enables an override of a qualifier based on CUSIP
- Industry: Enables an override of a qualifier based on industry
- Sector: Enables an override of a qualifier based on industry sector.

Once the action is completed, a row is added in the Overrides section reflecting the addition of the override; in addition, a row is added in the Case Actions section also reflecting the change.



3.10.7 Suitability Profile

This section displays suitability information for the client and account. The information displayed includes birth date, age, account risk tolerance, account investment objective, trading experience, income, and net worth (among other details). On older records, the client's current suitability profile is accessible via the link found at the top of the account detail page displayed as the account number.

3.10.8 Account

This section displays detailed information about the account. The information displayed includes account ID, shell ID, title, type of account, registration type, rep for the account, open date (among other details). On older records, the current account information is accessible via the link found at the top of the account detail page displayed as the account number.

3.10.9 Balance

This section displays current account balance information. The information displayed includes asset amount, equity amount and cash market value (among other details).

3.10.10 Positions

This section displays information about positions that exist for an account. The information includes position name, product type, symbol, CUSIP, quantity, price, market value, account type, and position percent (i.e., of total). Separate tables are provided for each product type (e.g. equity, mutual fund, fixed income, etc.)

3.10.11 Trade History

This section displays trading activity in the account for the 90 days prior to the current ranking period date. The information includes date, product type, name, symbol, buy/sell, quantity, price, commission, rep, fund family, share class, account type, exchange, solicited, etc. for all transaction types (including cash and deliver transactions).

3.11 Account Periodic Alert Summary

The **Account Periodic Alert Summary** screen provides a consolidated view of all accounts on which alerts triggered on the date indicated in the Submit Date column. A yellow flag displays on all accounts in the results.

This screen—along with the corresponding sub-level screens—supports the review of account violations for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.

Clicking opens the **Account Periodic Detail** screen and displays additional information on the alert for the related account. (For more information on viewing account detail, see <u>Account Periodic Detail</u>.)



3.11.1 Filtering Account Periodic Alert Summary

The **Account Periodic Alert Summary** screen includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)



Account Periodic Alert Summary Filters

The individual filters available on **Account Periodic Alert Summary** is the same as on **Account Periodic Review Summary**. See Account Periodic Review Summary Filters for details.

3.12 Account Rank Summary

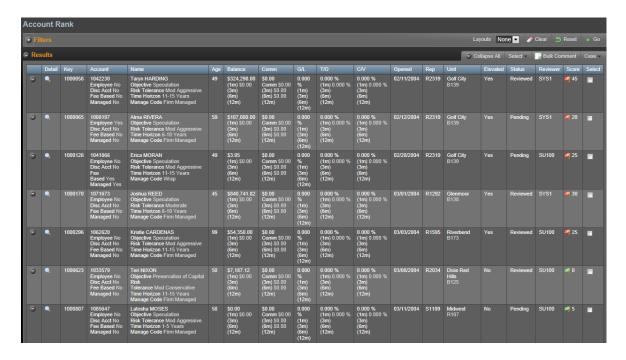
The **Account Rank Summary** screen provides a consolidated view of all accounts on which alerts triggered for the period ending on the date displayed in the *Period* column. The risk rank evaluation is done on a periodic basis (typically monthly).

This screen—along with the corresponding sub-level screens—provides the reviewer with the information needed to review the accounts for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.

A green flag displays on accounts that have passed the applicable, activated rules. A yellow or red flag displays on accounts that met criteria set within the activated rules depending on severity.

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Gain/Loss, Turnover, Commission Velocity

The details on **Account Rank Summary** show the commission (Comm), gain/loss percentage (G/L), turnover percentage (T/O), and commission velocity percentage (C/V) based on the pre-set look-back period for the account ranking process. Typically this defaults to a period of 90 days and is annualized for 365 days—meaning that if the turnover or commission velocity rate for the previous 90 days continued for 365 days the values shown are what the rate would be. (Note: Annualized turnover = turnover amount times 365 divided by 90. Annualization of these percentages is optional and is driven by a parameter setting.)

Account turnover is defined as the lesser of buys and sells divided by the average balance equity amount for the look-back period—annualized for 365 days.

Commission velocity is defined as the total commissions generated for the account (over a specified period of time) divided by the average account balance—annualized for 365 days.

The detailed view shows the values for the filterable periods of 1 month, 3 months, 6 months and 12 months.

Flagged Accounts

Flagged accounts are accounts on which one or more alerts triggered—the cumulative score of which met the firm-defined aggregated score threshold for review.

Elevated Accounts

Accounts with a Yes in the *Elevated* column experienced at least one condition for which the score exceeded the *maximum* threshold set in the alert parameter configuration—thus making it severe enough to merit manual review regardless of any other condition in the account.

Elevated & Flagged Accounts

Accounts that have both a high enough score to be *Flagged* and have at least one condition for which the score exceeded the *maximum* threshold set for the alert are both *Elevated* and *Flagged*.



Each Account Rank result is automatically updated to a *Closed* status with the execution of the subsequent review process unless the Account is *Flagged* or *Elevated* or the case status is *In Progress*.

3.12.1 Filtering Account Rank Summary

Account Rank Summary includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)



Account Rank Summary Filters

Below is the list of individual filters available on Account Rank Summary with related information.

Filter Name	Functionality
General	
Key	Filters for accounts by result key.
Firm Key	Filters for accounts by line of business or sub-firm.
Account-Related Filters	
Account	Filters for accounts by account number.
Opened	Filters for accounts by the date that the account was opened.
	This is helpful for heightened supervision of new accounts.
Fee Based	Filters for accounts identified as fee based.
Plan Type	Filters for accounts by qualified plan type.
Reg Type	Filters for accounts by account registration type.
Managed	Filters for accounts identified as managed. A managed account is one in which the primary account holder has delegated to an account manager rights to trade in any security that fits the investment profile of the account.
Managed Type	Filters for accounts designated as managed by managed program type.



0''	F96 - 6	
Citizenship	Filters for accounts by the primary account holder's citizenship status.	
Country Code	Filters for accounts by the primary account holder's country.	
Name	Filters for accounts by account name.	
Tax ID	Filters for accounts by account name. Filters for accounts by the primary account holder's tax ID.	
Age	Filters for accounts by the primary account holder's age.	
Time Horizon	Filters for accounts by the primary account holder's time	
	horizon.	
Objective	Filters for accounts by primary accounts holder's investment objective.	
Risk Tolerance	Filters for accounts by the primary account holder's risk tolerance.	
Risk Rank	Filters for accounts by the primary account holder's assigned	
	risk value. (Risk values are assigned and provided by each firm	
	as part of the nightly data feed).	
Employee	Filters for employee accounts.	
Disc Acct	Filters for accounts identified as discretionary. A discretionary	
	account is one in which the primary account holder has given	
	the registered representative discretion to place trades without	
Assessed Vistor Ball (15%)	prior approval.	
Account-Value-Related Filters		
Gain/Loss	Filters for accounts based on gain/loss percentage for the	
	selected period.	
Gain/Loss Amt	Filters for accounts based on gain/loss amount for the selected period.	
Turnover	Filters for accounts based on turnover percentage for the	
Turriover	selected period.	
Velocity	Filters for accounts based on commission velocity percentage	
	for the selected period.	
Assets New	Filters for accounts based on value of new assets for the	
	selected period.	
Assets Avg	Filters for accounts based on average asset value for the	
	selected period.	
Asset Amt	Filters for accounts based on end-of-month asset amount.	
Commissions	Filters for accounts based on commission amount for the selected period.	
Total Buys	Filters for accounts based on aggregated buy transaction	
-	amounts for the selected period.	
Total Sells	Filters for accounts based on aggregated sell transaction	
	amounts for the selected period.	
Trade Count	Filters for accounts based on trade count for the selected	
	period.	
Trade Score Avg	Filters for accounts based on trade average score for the	
	selected period.	
Alert-Related Filters		
Period	Filters for accounts by date of the last day of the month for	
	which the review was performed.	
Score	Filters for accounts by alert score.	
Alert	Filters for accounts by alert. An alert is one or more rules in a	
	group of rules known as a rule set	



Sub-Alert	Filters for accounts by sub-alert. Sub-alerts are individual rules within rule sets.	
Flagged	Filters for accounts by whether the account is Flagged.	
Elevated	Filters for accounts by whether the account is <i>Elevated</i> .	
Status	Filters for accounts by account review status.	
Resolution	Filters for accounts by the resolution of the case.	
Review Date	Filters for accounts by update date.	
Reviewer	Filters for accounts last reviewed by a particular user. Enter the User ID of the user.	
Stop Assignment	Filters for the route stop to which the case is currently assigned.	
Hierarchy-Related Filters		
The Type, Unit, and Trader allow a user to drill down to a specific level in the company's		
hierarchy. This can be done by selecting from the drop-down list or by directly entering a unit or		
rep number in the provided text boxes. Only those selections that fall into the user's hierarchy		
display in the drop-down boxes.		
Туре	Filters for accounts by unit type or level of the executing rep.	
Unit	Filters for accounts by unit of the executing rep.	
Trader	Filters for accounts by executing rep. The rep can be identified	
	either by selecting the rep from the list or by entering the rep	
	code in the free-entry field.	
As	See FIS Compliance Suite Platform User Guide.	
Depth	See FIS Compliance Suite Platform User Guide.	
User	Filters for accounts by rep code for all rep codes associated with	
	the specified user key.	

3.13 Account Rank Detail

All review results can be viewed in detail on the **Account Rank Detail** screen by clicking selected account in the search results on **Account Rank**.

Account Rank Detail provides users with a snapshot of the account at the time the account was reviewed.

From **Account Rank Detail** the user may jump to a specific section by clicking on the Profile, Account, Balance, Calcs, Positions or History hyperlinks in the header section of the screen.

Below is a list of sections that are provided on Account Rank Detail:

- Case Attachments
- Case Actions
- Case Action History
- Account Notes
- Summary
- Detail History
- Suppression History
- Overrides
- Alerts
- Account Rep
- Account Stats
- Suitability Profile



- Client Experience
- Held Away Assets
- Account
- Balance
- Current Asset Mix
- Position Calcs
- Positions
- Trade History.

3.13.1 Case Actions

This section displays the review history of an account and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.13.2 Case Action History

This section displays the history of actions on the case.

3.13.3 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)

3.13.4 Account Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.

Adding Notes

To Add a Note, click Add, enter the note text, and click Save.

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role. (For more information on viewing notes, see Notes.)

3.13.5 Summary

This section displays summary-level information about the account and related alerts.

3.13.6 Detail History

This section displays a history of summary-level information about the account and related alerts. To see the relevant information related to a historical result, select the result record by clicking the



corresponding checkbox in the Show column; click Refresh; then click the hyperlink in the Period column—which provides navigation to the relevant sections.

3.13.7 Suppression History

Alerts within **Account Rank** can be suppressed for a specified period of time. If an alert is suppressed, users are not notified again of the condition—regardless of whether the condition continues to be present—until the specified timeframe expires or the user manually removes the suppression rule.

In Suppression History, the user defines the suppression expiration date and can view the history of alert suppression.

To suppress an alert, click Add, select the alert, click and enter the suppression expiration date; then click Save.

This option is available only to users who are entitled to suppress alerts; however, all users can view suppression history.

To retire the suppression rule before the defined expiration date, click Expire. Suppression is then no longer in effect for the given alert.

The system administrator can limit the suppression timeframe according to firm policy.

For alerts that include securities such as Concentration Single Security, Concentration Low Priced Security, and Concentration High Yield Bond, the option is available to suppress just the securities causing the account to be over concentrated—as opposed to suppressing the alert for all securities.

3.13.8 Overrides

Qualifiers (i.e., parameters) applicable to certain alerts can be overridden for a given account so that alerts trigger based on qualifier override values instead of the standard qualifier values that are defined for the alerts. To add an alert qualifier override, click on the Overrides section header. In the section that is displayed titled Select Qualifier for Override, select an option from the Parameter drop-down. Note that only parameters that are relevant to the alert(s) that triggered on the account are displayed. Upon the selection of a parameter, the screen displays the information that is relevant to the qualifier and provides the option to enter an override value. When multiple rows are displayed, at least one must be selected to complete the action. Upon entry of the override value(s), click save to complete the action.

Three types of overrides are provided by the system:

- Security: Enables an override of a qualifier based on CUSIP
- Industry: Enables an override of a qualifier based on industry
- Sector: Enables an override of a qualifier based on industry sector.

Once the action is completed, a row is added in the Overrides section reflecting the addition of the override; in addition, a row is added in the Case Actions section also reflecting the change.

For certain alerts, the *Elevated* threshold can be overridden on an account-by-account basis—thus making the alert score more (or less) aggressively for a specific account.



Not all alerts have an associated account-specific setting.

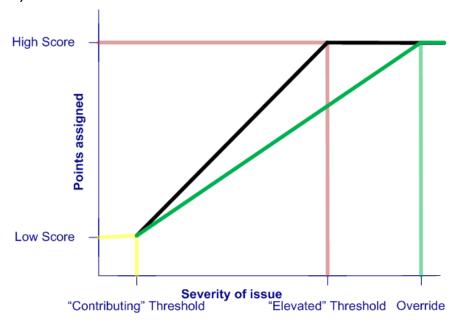
To override the *Elevated* threshold for a specific account, choose the parameter to override from the Parameter drop-down, enter the override value and click Save. The active override value displays along with the date that the override was created. During the next monthly review, the overridden *Elevated* threshold takes the place of the universal threshold when the review is executed on the account.

To deactivate the override, click the deactivate link next to the active parameter. The date of the deactivation now appears in the Action column.

3.13.9 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered.

The results of the risk ranking process are based on the account risk rank alert settings for the firm. All activated alerts have a base score and a high score as defined by the firm. The risk ranking process analyzes the account against the activated alerts and their associated contributing and *Elevated* thresholds. The individual alert score is determined based on where the result score falls within the contributing and *Elevated* alert thresholds and the Base and High score of the alert. Score values can be plotted on a slope as in the graphic below to illustrate severity. In the absence of an account-specific setting, the result score can be plotted along the black line of the diagram below. If the account has an account-specific override set, the scoring follows the green line in the diagram. The Account Rank score is calculated as the sum of the activated alert scores for the subject.



For more information on Alerts, see FIS Compliance Suite Platform Admin Guide.



3.13.10 Account Stats

This section displays account rank statistics for the prior month, three months, six months, and twelve months. Detailed information is provided about the account such as gain/loss, commission velocity, turnover, trade count, average trade score, total buys/sells, and balances.

3.13.11 Suitability Profile

This section displays suitability information for the client and account. The information displayed includes birth date, age, account risk tolerance, account investment objective, trading experience, income, and net worth (among other details).

3.13.12 Account

This section displays detailed information about the reviewed account. The information displayed includes account ID, shell ID, title, type of account, registration type, rep for the account, household of the account, open date (among other details).

3.13.13 Balance

This section displays current account balance information. The information displayed includes asset amount, equity amount, money market, cash market value (among other details).

3.13.14 Position Calcs

This section displays various position summary calculations for an account position. The information includes total high yield bond amount, total low priced stock amount, and portfolio standard deviation (among other details).

3.13.15 Positions

This section displays information about positions that exist for an account. The information includes position name, product type, symbol, CUSIP, quantity, price, market value, account type, and position percent (i.e., of total). Separate tables are provided for each product type (e.g. equity, mutual fund, fixed income, etc.)

3.13.16 Trade History

This section displays trading activity in the account for the 90 days prior to the current ranking period date. The information includes date, product type, name, symbol, buy/sell, quantity, price, commission, rep, fund family, share class, account type, exchange, solicited, etc. for all transaction types (including cash and deliver transactions).

3.14 AML (Anti-Money-Laundering) Summary

AML provides summary and detail information of all accounts that met the firm-defined risk conditions associated with the Anti-Money-Laundering alerts during the daily account analysis.

Some alerts include a historical look depending on the nature of the alert. The results display on **AML Summary**. By default **AML Summary** shows the results for the current analysis period. Only



accounts identified as potentially problematic during the review process based on the parameters set for the rules are displayed.

This screen—along with the corresponding sub-level screens—supports the review of account violations for which the reviewer is responsible. The alert score is displayed to indicate the firm's defined severity for the issue.



The details on the **AML Summary** screen show the date the alert triggered, the date the account was opened, the current account market value, and a 90-day historical look on the following statistics: Cash Velocity, Cash Count, Deliver Velocity, Deliver Count, Buy Count, and Sell Count where the counts are the number of transactions for each type within the 90-day look-back period.

Clicking opens the **AML Detail** screen and displays additional information on exceptions for the related account. (For more information on viewing account detail, see <u>AML Detail</u>.)

3.14.1 Filtering AML Summary

AML Summary includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click ext to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide.*)

AML Summary Filters

Below is the list of individual filters available on **AML Summary** with related information.

Filter Name	Functionality
General	
Key	Filters for accounts by result key. Each processed review result
	record is assigned a unique key by the system.
Firm Key	Filters for accounts by line of business or sub-firm.
Account-Related Filters	
Account	Filters for accounts by account number.
Open Date	Filters for accounts by the date the account was opened.
Employee	Filters for employee accounts.
Occupation	Filters for accounts by the primary accounts holder's occupation
-	(if specified).



Name	Ellere for accounts by account remain
Name	Filters for accounts by account name.
Client Age	Filters for accounts based on the primary account holder's age.
Tax ID	Filters for accounts by the primary account holder's tax ID.
Time Horizon	Filters for accounts based on the primary account holder's
	investment time horizon.
Citizenship	Filters for accounts based on the primary account holder's
	citizenship status.
Reg Type	Filters for accounts by account registration type.
Plan Type	Filters for accounts by qualified plan type.
Managed	Filters for accounts identified as managed. A managed account
	is one in which the primary account holder has delegated to an
	account manager rights to trade in any security that fits the
	investment profile of the account.
Managed Type	Filters for accounts designated as managed by managed
	program type.
Country	Filters for accounts by the primary account holder's country.
Objective	Filters for accounts by the primary account holder's investment
	objective.
Risk	Filters for accounts based on the risk tolerance of the primary
	account holder.
Risk Rank	Filters for accounts related to clients with an assigned risk value.
	(Risk values are assigned and provided by each firm as part of
	the nightly data feed).
Fee	Filters for accounts identified as fee based.
Disc Acct	Filters for accounts identified as discretionary. A discretionary
	account is one in which the primary account holder has given
	the registered representative discretion to place trades without
	approval for each trade.
Account-Value-Related	Filters
Asset Amount	Filters for accounts by asset amount.
Cash/MMKT	Filters for accounts by cash/money market balance.
Alert-Related Filters	
Alert	Filters for accounts by alert ID. An alert is one or more rules in
	a group of rules known as a rule set.
Sub-Alert	Filters for accounts by selected sub-alert. Sub-alerts are
	individual rules within rule sets.
Flag	Filters for accounts by alert severity.
Submit Date	Filters for accounts by the date on which they were loaded into
	the system.
Status	Filters for accounts by account review status.
Resolution	Filters for accounts by the resolution of the case.
Review Date	Filters for accounts last reviewed on a given date.
Reviewer	Filters for accounts last reviewed by a particular user. Enter the
	User ID of the user.
Stop Assignment	Filters for the route stop to which the case is currently assigned.
Hierarchy-Related Filter	
HIDPARCHV-POISTON FIITO	

The Type, Unit, and Trader filters allow a user to drill down to a specific level in the company's hierarchy. This can be done by selecting from the drop-down list or by directly entering a unit or rep number in the provided text boxes. Only those selections that fall into the user's hierarchy display in the drop-down boxes.



Туре	Filters for accounts by unit type or level of the executing rep.
Unit	Filters on accounts by unit of the executing rep.
Trader	Filters on accounts by executing rep. The rep can be identified
	either by selecting the rep from the list or by entering the rep
	code in the free-entry field.
As	See FIS Compliance Suite Platform User Guide.
Depth	See FIS Compliance Suite Platform User Guide.
User	Filters for accounts by rep code for all rep codes associated with
	the specified user key.

3.15 AML Detail

All review results can be viewed in detail on the **AML Detail** screen by clicking \(\bigcirc\) for a selected account in the search results on **AML Summary**.

AML Detail provides users with a snapshot of the account at the time the account was reviewed.

From **AML Detail** the user may jump to a specific section by clicking on the Balance, Profile, Account, Positions or History hyperlinks in the header section of the screen.

Information included on AML Detail includes:

- Alerts
- Case Actions
- Case Attachments
- Account Notes
- Suppression History
- Daily Cash Transactions
- Daily Deliver Transactions
- Account Reps
- Balance
- 90 Day Account Stats
- Suitability Profile
- Client Experience
- Held Away Assets
- Account
- Positions
- · Trade History.

3.15.1 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered. (For more information on alerts, see FIS Compliance Suite Platform User Guide.)



3.15.2 Case Actions

This section displays the review history of an account and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.15.3 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)

3.15.4 Account Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.

Adding Notes

To Add a Note, click Add, enter the note text, and click Save.

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role. (For more information on viewing notes, see <u>Notes</u>.)

3.15.5 Suppression History

Alerts within **AML** can be suppressed for a specified period of time. If an alert is suppressed, users are not notified again of the condition—regardless of whether the condition continues to be present—until the specified timeframe expires or the user manually removes the suppression rule.

In Suppression History, the user defines the suppression expiration date and can view the history of alert suppression.

To suppress an alert, click Add, select the alert, click and select the suppression expiration date: then click Save.

This option is available only to users who are entitled to suppress alerts; however, all users can view suppression history.

To retire the suppression rule before the defined expiration date, click Expire. Suppression is then no longer in effect for the given alert.

The system administrator can limit the suppression timeframe according to firm policy.

No threshold overrides exist for AML alerts. The alert is suppressed until the expiration date—with no override for a re-firing of the alert.

3.15.6 Account Reps

This section displays the rep(s) on the account.



3.15.7 Balance

This section displays current account balance information. The information displayed includes asset amount, equity amount, money market, cash market value (among other details).

3.15.8 90 Day Account Stats

This section displays 90-day account statistics. Detailed information about the account includes Cash Velocity, Cash Count, Deliver Velocity, Deliver Count, Deposits to income ratio, Deposits to Net Worth ratio, total withdrawals, and total deposits.

3.15.9 Suitability Profile

This section displays suitability information for the client and account. The information displayed includes birth date, age, account risk tolerance, account investment objective, trading experience, income, and net worth.

3.15.10 Account

This section displays detailed information about the account. The information includes account ID, shell ID, title, type of account, registration type, rep for the account, household of the account, open date, etc.

3.15.11 Positions

This section displays information about positions that exist for an account. The information includes position name, product type, symbol, CUSIP, quantity, price, market value, account type, and position percent (i.e., of total). Separate tables are provided for each product type (e.g. equity, mutual fund, fixed income, etc.)

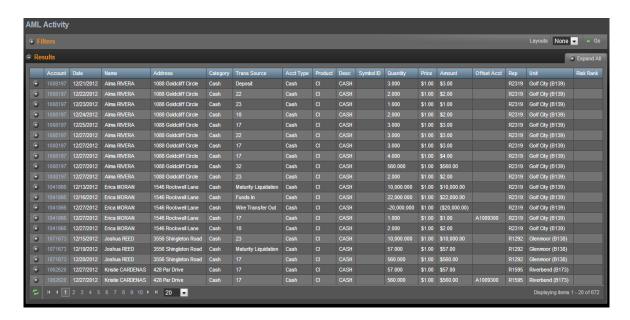
3.15.12 Trade History

This section displays trading activity in the account for the last 90 days. The information includes date, product type, name, symbol, buy/sell, quantity, price, commission, rep, fund family, share class, account type, exchange, solicited, etc. for all transaction types (including cash and deliver transactions).

3.16 AML Activity Summary

AML Activity Summary provides a consolidated view of the transaction activity analyzed as part of AML analysis. Activity includes trade, cash and deliver transactions. This activity is analyzed to determine potential violations as set by the firm-defined parameters. This screen is used to further support research associated with review results.





3.16.1 Filtering AML Activity Summary

AML Activity Summary includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)

AML Activity Summary Filters

Below is the list of individual filters available on AML Activity Summary with related information.

Filter Name	Functionality
General	
Key	Filters for accounts by result key. Each processed review result
	record is assigned a unique key by the system.
Firm Key	Filters for accounts by line of business or sub-firm.
Account-Related Filters	
Account	Filters for transactions related to an account number.
Open Date	Filters for transactions by the date the account was opened.
	The date can be entered manually by clicking and
	selecting the date from the calendar. To select a date range,
	select >i< or <=> from the drop-down box and then enter the
	start and end dates using the calendar. If only the first date is
	entered, the search returns transactions from that date forward.
	Alternatively, select LIST from the operator drop-down and then
	select a date option from the list.
Fee	Filters for transactions in accounts identified as fee based.
Plan Type	Filters for transactions in accounts by qualified plan type.
Reg Type	Filters for transactions in accounts by account registration type.



Managed	Filters for transactions in accounts identified as managed. A managed account is one in which the primary account holder
	has delegated to an account manager rights to trade in any
Managed Type	security that fits the investment profile of the account. Filters for transactions in accounts designated as managed by
wanageu Type	managed program type.
Name	Filters for transactions in accounts by account name.
Tax	Filters for transactions in accounts by the primary account
	holder's tax ID.
Age	Filters for transactions in accounts based on the primary account holder's age.
Occupation	Filters for transactions in accounts by the primary accounts
Cocapation	holder's occupation (if specified).
Time Horizon	Filters for transactions in accounts based on the primary
	account holder's investment time horizon.
Citizenship	Filters for transactions in accounts based on the primary
•	account holder's citizenship status.
Country	Filters for transactions in accounts by the primary account
<u>-</u>	holder's country.
Objective	Filters for transactions in accounts by the primary account
	holder's investment objective.
Risk	Filters for transactions in accounts based on the risk tolerance
	of the primary account holder.
Risk Rank	Filters for transactions in accounts related to clients with an
	assigned risk value.
Disc Acct	Filters for transactions in accounts identified as discretionary. A
	discretionary account is one in which the primary account
	holder has given the registered representative discretion to
Employee	place trades without approval for each trade.
Employee Transaction/Product-Rel	Filters for transactions on employee accounts.
Transaction/Product-Rei	aleu riilers
Product	Filters for transactions by product type.
Sub Prod	Filters for transactions by sub-product type.
Acct Type	Filters for transactions by account type (e.g. cash, margin,
	short).
Share	Filters for transactions by mutual fund share class.
Primary Exch	Filters for transactions based the primary exchange on which
	they trade.
Trans Source	Filters for transactions by their back-office transaction source
Descri	code (e.g. Purchase, Sale)
Desc	Filters for transactions by name of the security.
Symbol ID	Filters for transactions by ticker symbol of the security.
Cotogony	Filters for transactions by CUSIP of the security.
Category	Filters for transactions by whether they are categorized as Trade, Cash, or Deliver accounts.
Hierarchy-Related Filters	
	r filters allow a user to drill down to a specific level in the company's
	ne by selecting from the drop-down list or by directly entering a unit or
	d text boxes. Only those selections that fall into the user's hierarchy
display in the drop-down b	
all play in the drop down b	

Filters for transactions by unit type or level of the executing rep.

Туре



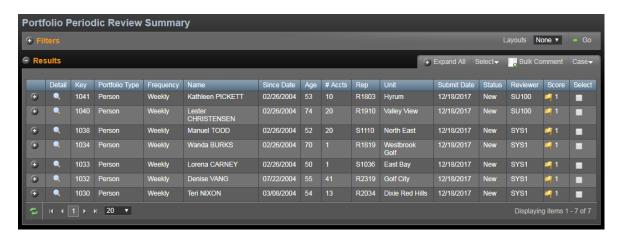
Unit	Filters on transactions by unit of the executing rep.
Trader	Filters on transactions by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep code in the free-entry field.
As	See FIS Compliance Suite Platform User Guide.
Depth	See FIS Compliance Suite Platform User Guide.
User	Filters for transactions by rep code for all rep codes associated with the specified user key.

3.17 Portfolio Periodic Review Summary

The **Portfolio Periodic Review Summary** screen provides a consolidated view of all Portfolios on which alerts triggered on the date indicated in the Submit Date column. A yellow flag displays on all Portfolios in the results.

The Portfolio Periodic review process is configured to execute on a daily, weekly, monthly, quarterly, or yearly basis based on the firm's preference.

A Portfolio is a collection of accounts which exists for the purpose of evaluating risk across multiple accounts that are related by common account ownership or some other criterion defined by the firm



This screen—along with the corresponding sub-level screens—supports the review of portfolio violations for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.

Clicking opens the **Portfolio Periodic Detail** screen and displays additional information on the alert for the related portfolio. (For more information on viewing portfolio detail, see Portfolio Periodic Detail.)

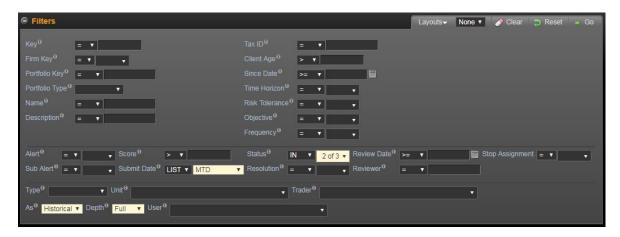
The identity of a portfolio and the relationship of account(s) to the portfolio are established via one of two methods (defined upon initial installation of the review module):

- Automated process: The identity of a portfolio is established via a process that is
 executed prior to review processing; a portfolio and its related account(s) are identified by
 Tax ID such that all accounts containing a given Tax ID are grouped into a portfolio
- Data feed: Files are provided by the firm that establish the identity of a portfolio and the relationship of account(s) to the portfolio based on a firm-defined criterion.



3.17.1 Filtering Portfolio Periodic Review Summary

The **Portfolio Periodic Review Summary** screen includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)



Portfolio Periodic Review Summary Filters

Below is the list of individual filters available on **Portfolio Periodic Review Summary** with related information.

Filter Name	Functionality
General	
Key	Filters for portfolios by result key. Each processed review result
	record is assigned a unique key by the system.
Firm Key	Filters for portfolios by line of business or sub-firm.
Portfolio-Related Filters	
Portfolio Key	Filters for portfolios by portfolio key.
Portfolio Type	Filters for portfolios by type of portfolio.
Name	Filters for portfolios by portfolio name.
Description	Filters for portfolios by portfolio description.
Tax ID	Filters for portfolios by the primary account holder's tax ID.
Client Age	Filters for portfolios by the primary account holder's age.
Since Date	Filters for portfolios by the date when the portfolio was established.
Time Horizon	Filters for portfolios by investment time horizon.
Risk Tolerance	Filters for portfolios by risk tolerance.
Objective	Filters for portfolios by investment objective.
Result/Workflow-Related Filters	
Frequency	Filters for portfolios by review process frequency.
Alert	Filters for portfolios by alert ID. An alert is one or more rules in
	a group of rules known as a rule set.



Sub-Alert	
Sub-Aleit	Filters for portfolios by sub-alert. Sub-alerts are individual rules within rule sets.
Score	Filters for portfolios by alert score.
Submit Date	Filters for portfolios by the date on which they were loaded into
	the system.
Status	Filters for portfolios by portfolio review status.
Resolution	Filters for portfolios by the resolution of the case.
Review Date	Filters for portfolios by review date.
Reviewer	Filters for portfolios last reviewed by a particular user. Enter the User ID of the user.
Stop Assignment	Filters for the route stop to which the case is currently assigned.
hierarchy. This can be don	r allow a user to drill down to a specific level in the company's ne by selecting from the drop-down list or by directly entering a unit or lext boxes. Only selections that fall into the user's hierarchy display in
hierarchy. This can be don rep number in the provided the drop-down boxes.	ne by selecting from the drop-down list or by directly entering a unit or
hierarchy. This can be don rep number in the provided	ne by selecting from the drop-down list or by directly entering a unit or I text boxes. Only selections that fall into the user's hierarchy display in
hierarchy. This can be don rep number in the provided the drop-down boxes. Type	ne by selecting from the drop-down list or by directly entering a unit or lext boxes. Only selections that fall into the user's hierarchy display in Filters for portfolios by the unit type or level of the executing rep.
hierarchy. This can be don rep number in the provided the drop-down boxes. Type Unit	Filters on portfolios by the unit of the executing rep. Filters on portfolios by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep
hierarchy. This can be don rep number in the provided the drop-down boxes. Type Unit Trader	Filters on portfolios by the unit of the executing rep. Filters on portfolios by executing rep. Filters on portfolios by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep code in the free-entry field.
hierarchy. This can be don rep number in the provided the drop-down boxes. Type Unit	Filters on portfolios by the unit type or level of the executing rep. Filters on portfolios by the unit of the executing rep. Filters on portfolios by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep code in the free-entry field. See FIS Compliance Suite Platform User Guide.
hierarchy. This can be don rep number in the provided the drop-down boxes. Type Unit Trader	Filters on portfolios by the unit of the executing rep. Filters on portfolios by executing rep. Filters on portfolios by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep code in the free-entry field.
hierarchy. This can be don rep number in the provided the drop-down boxes. Type Unit Trader As	Filters on portfolios by the unit type or level of the executing rep. Filters on portfolios by the unit of the executing rep. Filters on portfolios by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep code in the free-entry field. See FIS Compliance Suite Platform User Guide.

3.18 Portfolio Periodic Detail

All review results can be viewed in detail on the **Portfolio Periodic Detail** screen by clicking solution of a selected portfolio in the search results on **Portfolio Periodic Review Summary**.

Portfolio Periodic Detail provides a snapshot of the portfolio at the time the portfolio was reviewed.

From **Portfolio Periodic Detail** the user may jump to a specific section by clicking on the Profile, Portfolio, Accounts, Balance, Calcs, Positions or History hyperlinks in the header section of the screen.

Below is a list of sections that are provided on Portfolio Periodic Detail:

- Alerts
- Case Actions
- Case Attachments
- Portfolio Notes
- Suppression History
- Overrides
- Portfolio Risk Score
- Portfolio Rep
- Suitability Profile
- Portfolio
- Portfolio Accounts



- Balance
- Portfolio Position Calcs
- Current Asset Mix
- Positions Summary
- Transaction History.

3.18.1 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered. (For more information on alerts, see FIS Compliance Suite Platform User Guide.)

3.18.2 Case Actions

This section displays the review history of a portfolio and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.18.3 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)

3.18.4 Portfolio Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.

Adding Notes

To Add a Note, click Add, enter the note text, and click Save.

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role. (For more information on viewing notes, see <u>Notes</u>.)

3.18.5 Suppression History

Alerts within **Portfolio Periodic** can be suppressed for a specified period of time. If an alert is suppressed, users are not notified again of the condition—regardless of whether the condition continues to be present—until the specified timeframe expires or the user manually removes the suppression rule.

In Suppression History, the user defines the suppression expiration date and can view the history of alert suppression.

To suppress an alert, click Add , select the alert, click and enter the suppression expiration date: then click Save.

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This option is available only to users who are entitled to suppress alerts; however, all users can view suppression history.

To retire the suppression rule before the defined expiration date, click Expire. Suppression is then no longer in effect for the given alert.

The system administrator can limit the suppression timeframe according to firm policy.

3.18.6 Overrides

Qualifiers (i.e., parameters) applicable to certain alerts can be overridden for a given portfolio so that alerts trigger based on qualifier override values instead of the standard qualifier values that are defined for the alerts. To add an alert qualifier override, click on the Overrides section header. In the section that is displayed titled Select Qualifier for Override, select an option from the Parameter drop-down. Note that only parameters that are relevant to the alert(s) that triggered on the portfolio are displayed. Upon the selection of a parameter, the screen displays the information that is relevant to the qualifier and provides the option to enter an override value. When multiple rows are displayed, at least one must be selected to complete the action. Upon entry of the override value(s), click

Three types of overrides are provided by the system:

- Security: Enables an override of a qualifier based on CUSIP
- Industry: Enables an override of a qualifier based on industry
- Sector: Enables an override of a qualifier based on industry sector.

Once the action is completed, a row is added in the Overrides section reflecting the addition of the override; in addition, a row is added in the Case Actions section also reflecting the change.

3.18.7 Portfolio Risk Score

This section displays the portfolio risk score that is generated within the Risk Score module and related information.

3.18.8 Portfolio Rep

This section displays information about the rep assigned to the portfolio. The information displayed includes the user ID, name, phone number, email address, licenses, and states in which the rep is registered to operate.

3.18.9 Suitability Profile

This section displays suitability information for the client and/or portfolio. The information displayed includes birth date, age, risk tolerance, investment objective, income, and net worth (among other details). On older records, the current suitability profile is accessible via the link found at the top of the portfolio detail page displayed as the portfolio key.

3.18.10 Portfolio

This section displays detailed information about the portfolio. The information displayed includes portfolio key, portfolio type, name, description, rep for the portfolio, and since date (among other



details). On older records, the current portfolio information is accessible via the link found at the top of the portfolio detail page displayed as the portfolio key.

3.18.11 Portfolio Accounts

This section displays information about the accounts that are related to the portfolio. The information displayed includes account number, title, open date and rep code for each account.

3.18.12 Balance

This section displays current aggregated account balance information. The information displayed includes asset amount, equity amount and cash market value (among other details).

3.18.13 Portfolio Position Calcs

This section displays various summary calculations on account positions within the portfolio. The information includes position distributions across share classes.

3.18.14 Positions Summary

This section displays information about positions that exist within the portfolio. The information includes position name, market value, and percent of portfolio. A separate table is provided for each product type (e.g. equity, mutual fund, fixed income, etc.) via a pop-up window that displays upon click of a given link in the Product Type column.

3.18.15 Transaction History

This section displays trading activity in the portfolio for the 90 days prior to the current review date. The information includes transaction amount, transaction count, and number of accounts involved for all transaction types (including cash and deliver transactions).

3.19 Portfolio Periodic Alert Summary

The **Portfolio Periodic Review Summary** screen provides a consolidated view of all Portfolios on which alerts triggered on the date indicated in the Submit Date column. A yellow flag displays on all Portfolios in the results.

The Portfolio Periodic review process is configured to execute on a daily, weekly, monthly, quarterly, or yearly basis based on the firm's preference.

This screen—along with the corresponding sub-level screens—supports the review of portfolio violations for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.

Clicking opens the **Portfolio Periodic Detail** screen and displays additional information on the alert for the related portfolio. (For more information on viewing Portfolio detail, see Portfolio Periodic Detail.)



3.19.1 Filtering Portfolio Periodic Alert Summary

The **Portfolio Periodic Alert Summary** screen includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)



Portfolio Periodic Alert Summary Filters

The individual filters available on **Portfolio Periodic Alert Summary** are the same as on **Portfolio Periodic Review Summary**. See Portfolio Periodic Review Summary Filters for details.

3.20 Portfolio Rank Summary

The **Portfolio Rank Summary** screen provides a consolidated view of all Portfolios on which alerts triggered for the period ending on the date displayed in the *Period* column. The risk rank evaluation is done on a periodic basis (typically monthly).

A portfolio is a collection of accounts which exists for the purpose of evaluating risk across multiple accounts that are related by common account ownership or some other criterion defined by the firm.

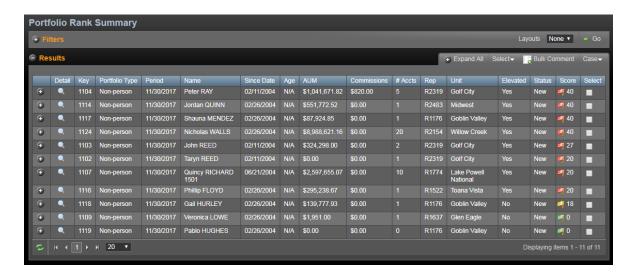
The identity of a portfolio and the relationship of account(s) to the portfolio are established via one of two methods (defined upon initial installation of the review module):

- Automated process: The identity of a portfolio is established via a process that is
 executed prior to review processing; a portfolio and its related account(s) are identified by
 Tax ID such that all accounts containing a given Tax ID are grouped into a portfolio
- Data feed: Files are provided by the firm that establish the identity of a portfolio and the relationship of account(s) to the portfolio based on a firm-defined criterion.

This screen—along with the corresponding sub-level screens—provides the reviewer with the information needed to review the portfolios for which the reviewer is responsible. The aggregated alert score is displayed to indicate the firm's defined severity for the issue.

A green flag displays on Portfolios that have passed the applicable, activated rules. A yellow or red flag displays on Portfolios that met criteria set within the activated rules depending on severity.





Gain/Loss, Turnover, Commission Velocity

The details on **Portfolio Rank Summary** show the commissions, gain/loss percentage, turnover percentage, and commission velocity percentage based on the pre-set look-back period for the portfolio ranking process. Typically this defaults to a period of 90 days and is annualized for 365 days—meaning that if the turnover or commission velocity rate for the previous 90 days continued for 365 days the values shown are what the rate would be. (Note: Annualized turnover = turnover amount times 365 divided by 90. Annualization of these percentages is optional and is driven by a parameter setting.)

Portfolio turnover is defined as the lesser of buys and sells divided by the average balance equity amount for the look-back period—annualized for 365 days.

Commission velocity is defined as the total commissions generated for the portfolio (over a specified period of time) divided by the average portfolio balance—annualized for 365 days.

Flagged Portfolios

Flagged Portfolios are Portfolios on which one or more alerts triggered—the cumulative score of which met the firm-defined aggregated score threshold for review.

Elevated Portfolios

Portfolios with a Yes in the *Elevated* column experienced at least one condition for which the score exceeded the *maximum* threshold set in the alert parameter configuration—thus making it severe enough to merit manual review regardless of any other condition in the Portfolio.

Elevated & Flagged Portfolios

Portfolios that have both a high enough score to be *Flagged* and have at least one condition for which the score exceeded the *maximum* threshold set for the alert are both *Elevated* and *Flagged*.

Each Portfolio Rank result is automatically updated to a *Closed* status with the execution of the subsequent review process unless the Portfolio is *Flagged* or *Elevated* or the case status is *In Progress*.

3.20.1 Filtering Portfolio Rank Summary

Portfolio Rank Summary includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities.



Click next to Filters to display the available filter criteria. (For more information on using filters, see FIS Compliance Suite Platform User Guide.)



Portfolio Rank Summary Filters

Below is the list of individual filters available on Portfolio Rank Summary with related information.

Filter Name	Functionality
General	
Key	Filters for portfolios by result key.
Firm Key	Filters for portfolios by line of business or sub-firm.
Portfolio-Related Filters	
Portfolio Key	Filters for portfolios by portfolio key.
Portfolio Type	Filters for portfolios by type of portfolio.
Name	Filters for portfolios by portfolio name.
Description	Filters for portfolios by portfolio description.
Risk Score	Filters for portfolios by risk score.
Tax ID	Filters for portfolios by the primary account holder's tax ID.
Client Age	Filters for portfolios by the primary account holder's age.
Since Date	Filters for portfolios by the date when the portfolio was established.
Time Horizon	Filters for portfolios by investment time horizon.
Risk Tolerance	Filters for portfolios by risk tolerance.
Objective	Filters for portfolios by investment objective.
Portfolio-Value-Related Filter	s
Velocity	Filters for portfolios based on commission velocity percentage for the selected period.
Turnover	Filters for portfolios based on turnover percentage for the selected period.
Commissions	Filters for portfolios based on commission amount for the selected period.
Assets New	Filters for portfolios based on value of new assets for the selected period.



Assets Avg	Filters for portfolios based on average asset value for the
	selected period.
Assets Amt	Filters for portfolios based on end-of-month asset amount.
Gain/Loss	Filters for portfolios based on gain/loss percentage for the
	selected period.
Gain/Loss Amt	Filters for portfolios based on gain/loss amount for the selected
	period.
Total Buys	Filters for portfolios based on aggregated buy transaction
	amounts for the selected period.
Total Sells	Filters for portfolios based on aggregated sell transaction
	amounts for the selected period.
Trade Count	Filters for portfolios based on trade count for the selected
	period.
Alert-Related Filters	
Period	Filters for portfolios by date of the last day of the month for
	which the review was performed.
Score	Filters for portfolios by alert score.
Alert	Filters for portfolios by alert. An alert is one or more rules in a
	group of rules known as a rule set
Sub-Alert	Filters for portfolios by sub-alert. Sub-alerts are individual rules
	within rule sets.
Flagged	Filters for portfolios by whether the portfolio is <i>Flagged</i> .
Elevated	Filters for portfolios by whether the portfolio is <i>Elevated</i> .
Status	Filters for portfolios by portfolio review status.
Resolution	Filters for portfolios by the resolution of the case.
Review Date	Filters for portfolios by update date.
Reviewer	Filters for portfolios last reviewed by a particular user. Enter the
	User ID of the user.
Stop Assignment	Filters for the route stop to which the case is currently assigned.
Hierarchy-Related Filters	
	w a user to drill down to a specific level in the company's
	selecting from the drop-down list or by directly entering a unit or
	boxes. Only those selections that fall into the user's hierarchy
display in the drop-down boxes	
Туре	Filters for portfolios by unit type or level of the executing rep.
Unit	Filters for portfolios by unit of the executing rep.
Trader	Filters for portfolios by executing rep. The rep can be identified
	either by selecting the rep from the list or by entering the rep
	code in the free-entry field.
As	See FIS Compliance Suite Platform User Guide.
Depth	See FIS Compliance Suite Platform User Guide.
User	Filters for portfolios by rep code for all rep codes associated with
	the specified user key.
	p woo

3.21 Portfolio Rank Detail

All review results can be viewed in detail on the **Portfolio Rank Detail** screen by clicking \P for a selected portfolio in the search results on **Portfolio Rank**.

Portfolio Rank Detail provides users with a snapshot of the portfolio at the time the portfolio was reviewed.



From **Portfolio Rank Detail** the user may jump to a specific section by clicking on the Profile, Portfolio, Accounts, Balance, Calcs, Positions or History hyperlinks in the header section of the screen.

Below is a list of sections that are provided on Portfolio Rank Detail:

- Case Attachments
- Case Actions
- Case Action History
- Portfolio Notes
- Summary
- Detail History
- Suppression History
- Overrides
- Portfolio Risk Score
- Alerts
- Portfolio Rep
- Portfolio Stats
- Suitability Profile
- Portfolio
- Portfolio Accounts
- Balance
- Portfolio Position Calcs
- Current Asset Mix
- Positions Summary
- Transaction History.

3.21.1 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)

3.21.2 Case Actions

This section displays the review history of a portfolio and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.21.3 Case Action History

This section displays the history of actions on the case.



3.21.4 Portfolio Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.

Adding Notes

To Add a Note, click Add, enter the note text, and click Save

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role. (For more information on viewing notes, see <u>Notes</u>.)

3.21.5 Summary

This section displays summary-level information about the portfolio and related alerts.

3.21.6 Detail History

This section displays a history of summary-level information about the portfolio and related alerts. To see the relevant information related to a historical result, select the result record by clicking the corresponding checkbox in the Show column; click Refresh; then click the hyperlink in the Period column—which provides navigation to the relevant sections.

3.21.7 Suppression History

Alerts within **Portfolio Rank** can be suppressed for a specified period of time. If an alert is suppressed, users are not notified again of the condition—regardless of whether the condition continues to be present—until the specified timeframe expires or the user manually removes the suppression rule.

In Suppression History, the user defines the suppression expiration date and can view the history of alert suppression.

To suppress an alert, click Add, select the alert, click and enter the suppression expiration date: then click Save.

This option is available only to users who are entitled to suppress alerts; however, all users can view suppression history.

To retire the suppression rule before the defined expiration date, click Expire. Suppression is then no longer in effect for the given alert.

The system administrator can limit the suppression timeframe according to firm policy.

For alerts that include securities such as Concentration Single Security, the option is available to suppress just the securities causing the portfolio to be over concentrated—as opposed to suppressing the alert for all securities.



3.21.8 Overrides

Qualifiers (i.e., parameters) applicable to certain alerts can be overridden for a given portfolio so that alerts trigger based on qualifier override values instead of the standard qualifier values that are defined for the alerts. To add an alert qualifier override, click on the Overrides section header. In the section that is displayed titled Select Qualifier for Override, select an option from the Parameter drop-down. Note that only parameters that are relevant to the alert(s) that triggered on the portfolio are displayed. Upon the selection of a parameter, the screen displays the information that is relevant to the qualifier and provides the option to enter an override value. When multiple rows are displayed, at least one must be selected to complete the action. Upon entry of the override value(s), click save to complete the action.

Three types of overrides are provided by the system (as applicable based on the alerts provided within the module):

- Security: Enables an override of a qualifier based on CUSIP
- Industry: Enables an override of a qualifier based on industry
- Sector: Enables an override of a qualifier based on industry sector.

Once the action is completed, a row is added in the Overrides section reflecting the addition of the override; in addition, a row is added in the Case Actions section also reflecting the change.

For certain alerts, the *Elevated* threshold can be overridden on a portfolio-by-portfolio basis—thus making the alert score more (or less) aggressively for a specific portfolio.

Not all alerts have an associated portfolio-specific setting.

To override the *Elevated* threshold for a specific portfolio, choose the parameter to override from the Parameter drop-down, enter the override value and click Save. The active override value displays along with the date that the override was created. During the next monthly review, the overridden *Elevated* threshold takes the place of the universal threshold when the review is executed on the portfolio.

To deactivate the override, click the deactivate link next to the active parameter. The date of the deactivation now appears in the Action column.

3.21.9 Portfolio Risk Score

This section displays the portfolio risk score that is generated within the Risk Score module and related information.

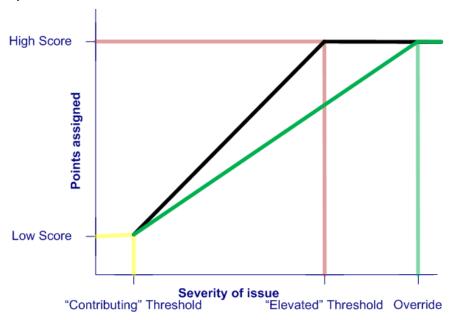
3.21.10 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered.

The results of the risk ranking process are based on the portfolio risk rank alert settings for the firm. All activated alerts have a base score and a high score as defined by the firm. The risk ranking process analyzes the portfolio against the activated alerts and their associated contributing and *Elevated* thresholds. The individual alert score is determined based on where the result score falls within the contributing and *Elevated* alert thresholds and the Base and High score of the alert. Score values can be plotted on a slope as in the graphic below to illustrate severity. In the absence



of a portfolio-specific setting, the result score can be plotted along the black line of the diagram below. If the portfolio has a portfolio-specific override set, the scoring follows the green line in the diagram. The Portfolio Rank score is calculated as the sum of the activated alert scores for the subject.



For more information on Alerts, see FIS Compliance Suite Platform Admin Guide.

3.21.11 Portfolio Stats

This section displays portfolio rank statistics for the prior month, three months, six months, and twelve months. Detailed information is provided about the portfolio such as gain/loss, commission velocity, turnover, trade count, average trade score, total buys/sells, and balances.

3.21.12 Suitability Profile

This section displays suitability information for the client and/or portfolio. The information displayed includes birth date, age, risk tolerance, investment objective, income, and net worth (among other details). On older records, the current suitability profile is accessible via the link found at the top of the portfolio detail page displayed as the portfolio key.

3.21.13 Portfolio

This section displays detailed information about the portfolio. The information displayed includes portfolio key, portfolio type, name, description, rep for the portfolio, and since date (among other details). On older records, the current portfolio information is accessible via the link found at the top of the portfolio detail page displayed as the portfolio key.



3.21.14 Portfolio Accounts

This section displays information about the accounts that are related to the portfolio. The information displayed includes account number, title, open date and rep code for the account.

3.21.15 Balance

This section displays current aggregated account balance information. The information displayed includes asset amount, equity amount and cash market value (among other details).

3.21.16 Portfolio Position Calcs

This section displays various summary calculations on account positions within the portfolio. The information includes includes position distributions across share classes.

3.21.17 Positions Summary

This section displays information about positions that exist within the portfolio. The information includes position name, market value, and percent of portfolio. A separate table is provided for each product type (e.g. equity, mutual fund, fixed income, etc.) via a pop-up window that displays upon click of a given link in the Product Type column.

3.21.18 Transaction History

This section displays trading activity in the portfolio for the 90 days prior to the current review date. The information includes transaction amount, transaction count, and number of accounts involved for all transaction types (including cash and deliver transactions).

3.22 Rep Rank Summary

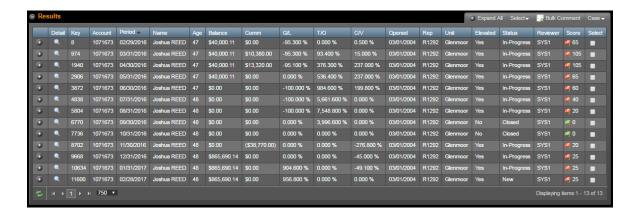
The **Rep Rank Summary** screen provides a consolidated view of all reps on which alerts triggered for the period ending on the date displayed in the *Period* column. The risk ranking analysis is done on a periodic basis (typically monthly).

Within the Rep Review screens (i.e., Rep Risk Rank and Rep Inquire), the term *rep* is used to denote a person—whereas in other parts of the application *rep* may refer to a rep code. Within the hierarchy data, persons are known as *users*; and in the context of Rep Review, *rep* is intended to mean a *user* that is assigned to one or more rep codes under which the person transacts business (in contrast to other system users who do not transact business; e.g., compliance personnel or system administrators). Each row on **Rep Rank Summary** and **Rep Inquire Summary** represents a *rep* user; and the details provided for the user include all business done under any rep code(s) under which the *rep* user can transact business.

This screen—along with the corresponding sub-level screens—supports the review of account violations for which the reviewer is responsible.

The user can click \(\bigcirc\) to open the **Rep Rank Detail** screen and view additional information on the alert for the related rep (for more information, see Rep Rank Detail).





Clicking opens the **Rep Rank Detail** screen and displays additional information on exceptions for the related rep. (For more information on viewing rep detail, see Rep Rank Detail.)

Score

All reps are scored and ranked for display on the **Rep Rank** screen regardless of whether they have been identified as high risk. The score result from the alert processing is displayed in the Score column.

AUM (Assets Under Management), Gain/Loss, Commissions, Velocity, Turnover, and # Accts

The details on the rep rank screen show the assets under management (AUM), commissions, number of accounts, and rep type (among other details).

Flagged Reps

Flagged reps are reps with a convergence of issues—which scored above the firm-defined aggregated score thresholds.

Elevated Reps

Reps with a Yes in the *Elevated* column experienced one condition alone for which the score exceeded the maximum threshold set in the alert parameter configuration—thus making it severe enough to merit manual review regardless of the other conditions in the account.

Elevated & Flagged Reps

Reps that have both a high enough score to be *Flagged* and have at least one condition for which the score exceeded the maximum threshold set for the alert are both *Elevated* and *Flagged*.

3.22.1 Filtering Rep Rank

Rep Rank includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide.*)





Rep Rank Summary Filters

Below is the list of individual filters available on Rep Rank with related information.

Filter Name	Functionality
General	
Key	Filters for accounts by result key. Each processed review result
	record is assigned a unique key by the system.
Rep-Related Filters	
User Name	Filters for rep reviews by user name.
User Key	Filters for rep reviews by rep code for all rep codes associated
	with the specified user key.
Hire Date	Filters for rep reviews by date of hire with the firm.
Annual Review	Filters for rep reviews by the date of the rep's last annual review
Rep Type	Filters for rep reviews by type.
CRD#	Filters for rep reviews by CRD number.
Certifications	Filters for rep reviews by the industry certifications held.
Degree	Filters for rep reviews by the highest education level completed.
Licenses	Filters for rep reviews by the FINRA series licenses held.
Registrations	Filters for rep reviews by the states in which they are registered
	to transact business.
Residence State	Filters for rep reviews by the states in which the rep has an
	address.
Citizenship	Filters for rep reviews by the citizenship status of the rep.
Disciplinary	Filters for rep reviews by the disciplinary status of the rep.
Rep-Value-Related Filters	
	es from all of the rep's accounts.
Velocity	Filters for rep reviews based on commission velocity percentage
	for the selected period.
Turnover	Filters for rep reviews based on account turnover percentage for
	the selected period.
Commissions	Filters for rep reviews based on commission amount for the
	selected period.
Assets New	Filters for rep reviews based on account value of new assets for
	the selected period.



Assets Avg	Filters for rep reviews based on account average asset value for the selected period.
Assets Amt	Filters for rep reviews based on account value of assets for the selected period.
Gain/Loss	Filters for rep reviews based on account gain/loss percentage
	for the selected period.
Gain/Loss Amt	Filters for rep reviews based on account gain/loss amount for the selected period.
Total Buys	Filters for rep reviews based on account aggregated buy transaction amounts for the selected period.
Total Sells	Filters for rep reviews based on account aggregated sell
	transaction amounts for the selected period.
Trade Count	Filters for rep reviews based on account trade count for the
Alast Dalata I Filtera (historia	selected period.
All of the filters in this section at	e used in combination with the Period selector. For example, if
the Score filter is used, it is app	lied to the review done for the period selected in the Period
selector.	
Period	Filters for rep reviews by date of the last day of the month for which the review was performed.
Score	Filters for rep reviews by alert score.
Alert	Filters for rep reviews by alert. An alert is one or more rules in a
	group of rules known as a rule set. The alerts available in this list are Rep Rank alerts only.
Sub-Alert	Filters rep reviews by sub-alert. Sub-alerts are individual rules
	within rule sets.
Flagged	Filters for rep reviews that have been Flagged.
Elevated	Filters for rep reviews review result that have been <i>Elevated</i> automatically due to one severe issue.
Alert-Related Filters (current)	
All of the filters in this section a	e applied independently of the Period selector.
Status	Filters for rep reviews by rep rank review status.
Resolution	Filters for rep reviews by the resolution of the case.
Review Date	Filters for rep reviews by review date.
Reviewer	Filters for rep reviews last reviewed by a particular user. Enter
Cton Assimumant	the User ID of the user.
Stop Assignment	Filters for the route stop to which the case is currently assigned.
Hierarchy-Related Filters	re allow a upor to drill down to a specific level in the company's
	rs allow a user to drill down to a specific level in the company's selecting from the drop-down list or by directly entering a unit or
	boxes. Only those selections that fall into the user's hierarchy
display in the drop-down boxes	
Туре	Filters for rep reviews by unit type or organization level of the
	rep.
Unit	Filters for rep reviews by unit of the rep.
Trader	Filters on rep reviews by executing rep. The rep can be
	identified either by selecting the rep from the list or by entering
	the rep code in the free-entry field.
As	See FIS Compliance Suite Platform User Guide.
Depth	See FIS Compliance Suite Platform User Guide.
User	Filters for rep reviews by executing rep code for all rep codes
	associated with the specified user key.



3.23 Rep Rank Detail

All review results can be viewed in detail on the **Rep Rank Detail** screen by clicking selected rep in the search results on **Rep Rank Summary**.

Rep Rank Detail provides users with a snapshot of the rep at the time the rep was reviewed.

From **Rep Rank Detail** the user may jump to a specific section by clicking on the Calcs, Positions or History hyperlinks in the header section of the screen.

Information included on the Rep Rank Detail includes:

- Case Attachments
- Case Actions
- Case Action History
- Rep Notes
- Summary
- Detail History
- Suppression History
- Overrides
- Alerts
- Rep Info
- Rep Stats
- Rep Position Calcs
- Current Asset Mix
- Client Profile Missing Information
- Client Profile Similar Information
- Industry Concentrations
- Single Security Concentrations
- Client Concentrations
- Production Mix By Industry
- Production Mix By Security
- Production Mix By Product Type
- Solicited Trading Activity By Security
- Non-Solicited Trading Activity By Security
- Positions Summary
- Trade History.

3.23.1 Case Attachments

This section displays a link to any document attached to the case. (For more information on case attachments, see FIS Compliance Suite Platform User Guide.)



3.23.2 Case Actions

This section displays the review history of a rep and provides a workflow to entitled users to add a case action. (For more information on the case action workflow, see *FIS Compliance Suite Platform User Guide*.)

3.23.3 Case Action History

This section displays the history of actions on the case.

3.23.4 Rep Notes

Notes are available to capture information or dialogue not meant for display to all system users. A user only has access to this section if the user's role is entitled.

Adding Notes

To Add a Note, click Add, enter the note text, and click Save.

The entry date and user are pre-filled with the current date/time and user ID of the logged-in user.

Viewing Notes

All notes can be viewed on the **Notes** screen from the **Review** menu. Access to notes is based on hierarchy and user role.

3.23.5 **Summary**

This section displays summary-level information about the portfolio and related alerts.

3.23.6 Detail History

This section displays a history of summary-level information about the rep and related alerts. To see the relevant information related to a historical result, select the result record by clicking the corresponding checkbox in the Show column; click Refresh; then click the hyperlink in the Period column—which provides navigation to the relevant sections.

3.23.7 Suppression History

Alerts within **Rep Rank** can be suppressed for a specified period of time. If an alert is suppressed, users are not notified again of the condition—regardless of whether the condition continues to be present—until the specified timeframe expires or the user manually removes the suppression rule.

In Suppression History, the user defines the suppression expiration date and can view the history of alert suppression.

To suppress an alert, click Add, select the alert, click and select the suppression expiration date; then click Save.

This option is available only to users who are entitled to suppress alerts; however, all users can view suppression history.



To retire the suppression rule before the defined expiration date, click Expire. Suppression is then no longer in effect for the given alert.

The system administrator can limit the suppression timeframe according to firm policy.

For certain alerts, the *Elevated* threshold can be overridden on a rep-by-rep basis, thus making the alert score less (or more) aggressively for a specific rep.

Not all alerts have an associated Rep-Specific Setting.

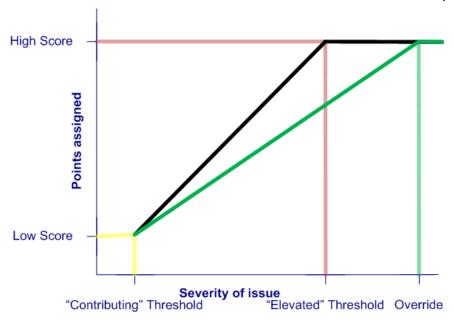
To override the *Elevated* threshold for a specific rep, choose the parameter to override from the Parameter drop-down, enter the override value and click Save. The active override value displays along with the date that the override was created. During the next monthly analysis, the overridden *Elevated* threshold takes the place of the universal threshold when the review is executed on this one rep.

To deactivate the override, click the deactivate link next to the active parameter. The date of the deactivation now appears in the Action column.

3.23.8 Alerts

This section lists the alert(s) that triggered and supporting information. In addition, letters can be pre-configured to generate relevant to any alert that triggered.

The results of the risk ranking process are based on the rep risk rank alert settings for the firm. All activated alerts have a base score and a high score as defined by the firm. The risk ranking process analyzes the account against the activated alerts and their associated contributing and *Elevated* thresholds. The individual alert score is determined based on where the result score falls within the contributing and *Elevated* alert thresholds and the Base and High score of the alert. Score values can be plotted on a slope as in the graphic below to illustrate severity. In the absence of a rep-specific setting, the result score can be plotted along the black line of the diagram below. If the rep has an rep-specific override set, the scoring follows the green line in the diagram. The Rep Rank score is calculated as the sum of the activated alert scores for the subject.





For more information on Alerts, see FIS Compliance Suite Platform Admin Guide.

3.23.9 Rep Info

This section displays basic information about the rep, including name, phone number, email, licenses and registered states.

3.23.10 Rep Stats

This section displays rep ranking statistics for the prior month, three months, six months, and twelve months. Detailed information is provided about the rep such as gain/loss, commission velocity, turnover, trade count, average trade score, total buys/sells, and balances (among other details).

Also included in this section are statistics for the positions held in the rep's account.

3.23.11 Rep Position Calcs

This section displays various summary calculations on account positions. The information includes total high-yield bond amount and total low-priced stock amount (among other details).

3.23.12 Positions Summary

This section displays summarized information about the positions that are held in the client accounts for which the rep is responsible during the analysis period. A separate table is provided for each product type (e.g. equity, mutual fund, fixed income, etc.) via a pop-up window that displays upon click of a given link in the Product Type column.

3.23.13 Trade History

This section displays summarized information on the cash activity, deliver activity and trade history in the accounts for which the rep is responsible during the analysis period. By clicking on the link in the Count column, additional details display about the activity and/or trade.

3.24 Portfolio Risk Score

Portfolio Risk Score is a module that is not accessible from the application menus and does not include screens involving workflow like other modules. The purpose of the module is to provide a mechanism by which the risk associated with a Portfolio can be evaluated according its attributes. Each Portfolio that is evaluated is given a risk score based on the configuration and parameter settings of the module.

The portfolio risk score and related information are displayed on the Detail screens of the Portfolio Rank and Portfolio Periodic modules.

4 Reports

The **Reports** menu provides management with statistical and trend data based on the data output from the review of firm transactions. These reports support the efforts of surveillance and compliance officers in monitoring company-wide patterns and identifying potential risk across the business.



Customizing the Report

Each report has a module selector that allows users to choose—based on the firm's implementation—the modules on which to report. Filter options and report headers dynamically adjust to the specific module selected.

4.1 Review Status by Unit report

This report summarizes the issue severity (red, yellow and green) on trades or accounts by unit. The report provides supervision oversight by indicating how efficiently cases are being addressed and closed through the display of case aging statistics of open and closed items.

The report is organized by hierarchy or unit and can be run by module based on the firm's specific implementation. Each unit displayed in the report contains a hyperlink that enables the display of a specific unit below the displayed unit.



The report is dynamic in that the column headings change to reflect client-specific and module-specific statuses according to the module selected (i.e., Trade, Account Daily, Account Periodic, Account Rank, AML, or Rep Rank).

On the Review Status by Unit - Account Daily and Review Status by Unit - Account Periodic reports, the Closed status labels display counts of system-closed items and manually closed items.

On the **Review Status by Unit - Account Rank** report, the Open status labels display the statistics of *Flagged and Elevated & Flagged* and *Green* issues. (For information on the *Elevated & Flagged* alert thresholds, see Account Rank Summary.)

The # and % columns are sortable to allow for information to be reorganized to display the greatest number or percentage of issues to the top of the list. The Total count (open + closed) column recalculates based on the filter criteria selected.

Avg Age is based on the average number of days between the current date and when an issue was submitted to the system. Max Age is determined by the oldest *submitted* time and the current date based on the filter criteria selected.

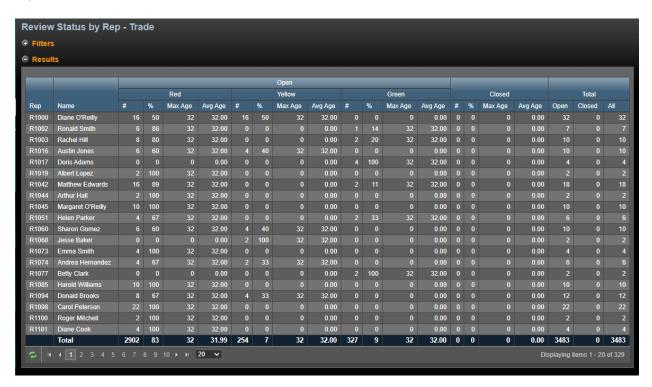
All issue percentages are rounded to the nearest whole number for display purposes. Percentages less than 1 display as their decimal values (e.g., .45).



4.2 Review Status by Rep report

The purpose of this report is to summarize the severity of issue(s) being generated by a rep's trades and/or accounts and also indicate how efficiently cases are being addressed and closed.

The report is organized by hierarchy or unit and can be run by module based on the firm's specific implementation.



The report is dynamic in that the column headings change to reflect client-specific and module-specific statuses according to the module selected (i.e., Trade, Account Periodic, Account Rank, AML, or Rep Rank).

On the Review Status by Rep - Account Daily and Review Status by Rep - Account Periodic reports, the Closed status labels display counts of system-closed items and manually closed items.

On the **Review Status by Rep - Account Rank** report, the Open status labels display the statistics of *Flagged and Elevated & Flagged* and green issues. (For information on the use *Elevated & Flagged* alert thresholds, see <u>Account Rank Summary</u>.)

The # and % columns are sortable to allow for the information to be reorganized to display the greatest number or percentage of issues to the top of the list. The Total count (open + closed) column recalculates based on the filter criteria selected.

Avg Age is based on the average number of days between the current date and when an issue was submitted to the system. Max Age is determined by the oldest *submitted* time and the current date based on the filter criteria selected.

All issue percentages are rounded to the nearest whole number for display purposes. Percentages less than 1 display as their actual decimal values (e.g., .45).



4.3 Alerts by Unit report

This report provides the number and percentage of trades and accounts processed by organization unit based on the filters selected; and both the total number and average number of alerts on a unit's trades, the number of rules being suppressed and the average and maximum number of actions taken on the issues.

The report is an excellent tool for identifying units with higher compliance risk in the organization, assessing the review process based on the actions taken, and accounting for trading and account volume within the unit.



The report is dynamic in that the column headings change to reflect client-specific and module-specific statuses according to the module selected (i.e., Trade, Account Daily, Account Periodic, Account Rank, AML, or Rep Rank).

The # Supp column is the number of alerts suppressed by unit based on the filter criteria. Actions Avg # is the average number of actions taken on an item within the unit based on the filter criteria. Actions Max # is the maximum number of actions taken on a single item based on the filter criteria. Avg Rules represents the average number of alerts on the trades or accounts (depending on the module selected) based on the filter criteria. Avg Score represents the average score per trade or account (depending on the module selected) based on the filter criteria.

These supervision oversight statistics provide a means to monitor and track the trends of the efficiency of the firm's sales practice and compliance processes.

4.4 Alerts by Rep report

This report displays the number and percentage of alerts by rep for the module selected (i.e., Trade, Account Daily, Account Periodic, Account Rank, AML, or Rep Rank). The report provides the number and percentage of trades and accounts for the rep based on the filters selected; and both the total number and average number of alerts on the reps' trades, the number of rules being suppressed and the average and maximum number of actions taken on the issues.

The report is an excellent tool for identifying registered reps with higher compliance risk in the organization, assessing the review process based on the actions taken, and accounting for trading and account volume for the rep.

(See the Alert by Unit description above for details on the report content.)





The report is dynamic in that the column headings change to reflect client-specific and module-specific statuses according to the module selected (i.e., Trade, Account Daily, Account Periodic, Account Rank, AML, or Rep Rank).

The # Supp column is the number of alerts suppressed by unit based on the filter criteria. Actions Avg # is the average number of actions taken on an item within the unit based on the filter criteria. Actions Max # is the maximum number of actions taken on a single item based on the filter criteria. Avg Rules represents the average number of alerts on the trades or accounts (depending on the module selected) based on the filter criteria. Avg Score represents the average score per trade or account (depending on the module selected) based on the filter criteria

These supervision oversight statistics provide a means to monitor and track the trends of the efficiency of the firm's sales practice and compliance processes.

4.5 Production by Unit report

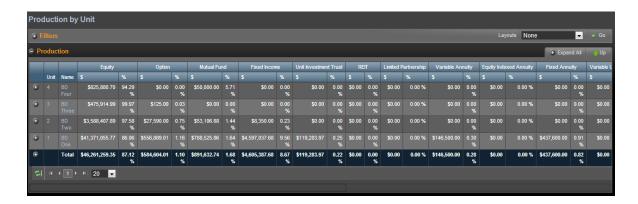
This report displays information on the amounts being invested by unit by product type. The report shows business in terms of amount invested in each type of product including the number of trades and the percentage of the whole that it represents.

Each row displayed contains a hyperlink that navigates to a specific unit and a hyperlink that navigates to the Production by Rep (**Production Rep**) report.

The report displays information for a default set of product types: EQ, OP, MF, FI, UIT, VA, FA and Other. The report can be customized to include only a user-selected set of product types by using the Product filter. If more product types are selected than can fit on the screen, a horizontal scroll bar allows scrolling to the right to display all products.

The production amounts for non-identified product types are included in the Other column.



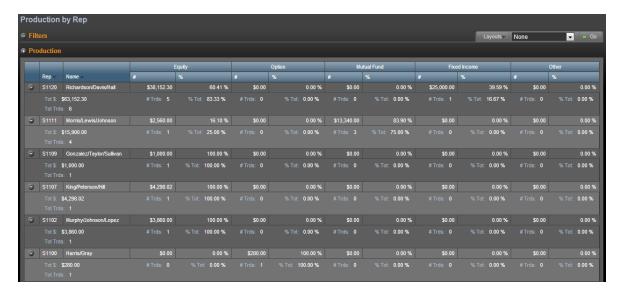


4.6 Production by Rep report

This report displays amounts invested by rep by product type. The report shows business in terms of amount invested in each type of product including the number of trades and the percentage of the whole that it represents.

The report displays information for a default set of product types: EQ, OP, MF, FI, UIT, VA, FA and Other. The report can be customized to include only a user-selected set of product types by using the Product filter. If more product types are selected than can fit on the screen, a horizontal scroll bar allows scrolling to the right to display all products.

The production amounts for non-identified product types are included in the Other column.



4.7 Share Class by Unit report

This report displays share class distribution of mutual fund purchase transactions by unit. It shows the number of transactions in which each share class is purchased and the percentage of the whole that it represents.

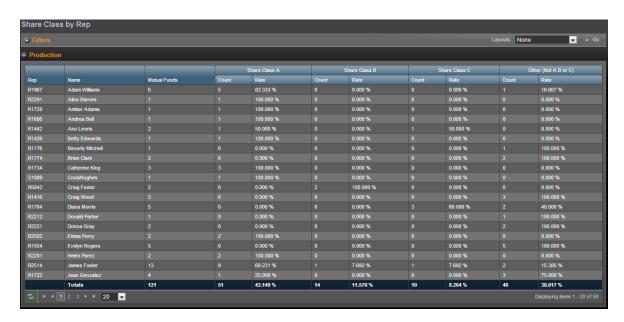
Each row displayed contains a hyperlink that navigates to a specific unit and a hyperlink that navigates to the Share Class by Rep (**Shares Rep**) report.





4.8 Share Class by Rep report

This report displays share class distribution of mutual fund purchases by rep. It shows the number of transactions in which each share class is purchased and the percentage rate (i.e., of the total).

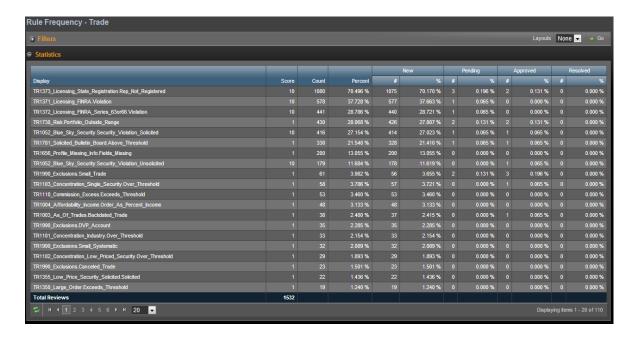




4.9 Rule Frequency report

This report displays the frequency of issues (i.e., alerts) occurring according to the module selected (i.e., Trade, Account Daily, Account Periodic, Account Rank, AML, or Rep Rank). The report is an excellent tool for identifying training issues requiring more attention by units or reps.

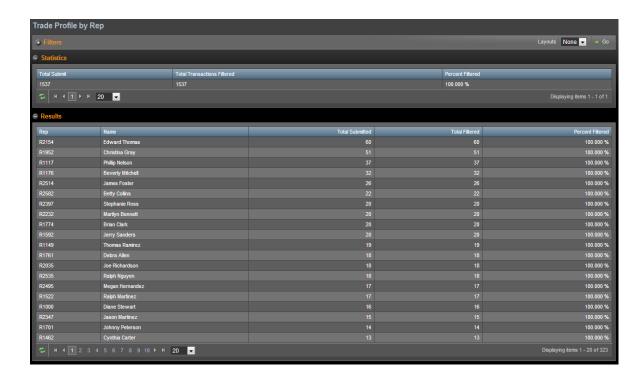
The report has an extensive list of filters to allow users to analyze trends of rule frequencies across various account, product and trade characteristics.





4.10 Trade Profile by Rep report

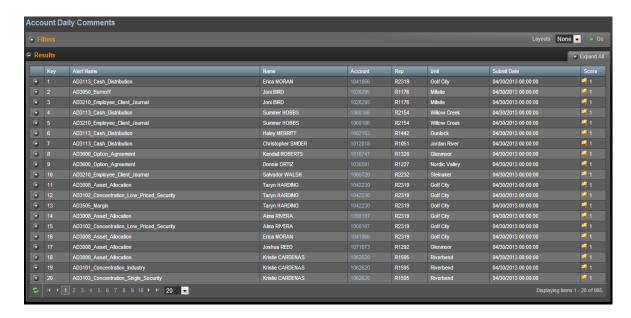
This report displays reps who have potentially engaged in a variety of questionable or high-risk activities across a significant portion of their book of business. For a given rep, the Trade Profile report shows the total number of trades submitted during a given period, the number of those trades meeting the filter criteria, and the percentage of total that met the criteria. A combination of filters support the ability to identify conditions that might not trigger alerts but when viewed across a rep's entire book of business may warrant further scrutiny.





4.11 Comments report

This report provides a consolidated view of all comments by module. It is used for isolating comments for a variety of clients, accounts, or trades that meet a filtered set of criteria. Reviewers using the report can quickly get a sense of the type and volume of comments users are adding to reviews and whether they are substantive. Columns headers display dynamically by module to give relevant information about the account or trade. Clicking on any row expands the display to provide details of the comment. Clicking the account number displays the current account profile and suitability details. The Flag/Score column provides the severity and score of the result to which the comment is tied.

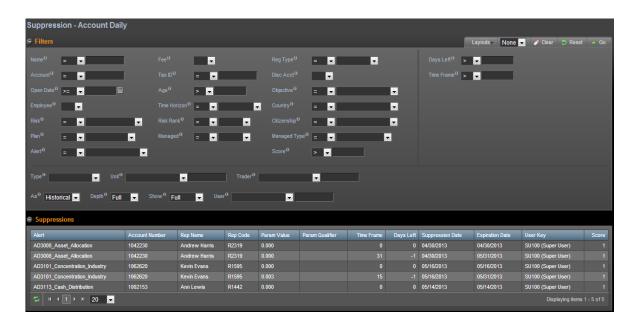




4.12 Suppression report

This report displays which alerts are being suppressed, by whom, how frequently, and for how long according to the module selected (i.e., Account Daily, Account Periodic, Account Rank, AML, or Rep Rank). The report is an excellent tool for identifying accounts with excessive suppression activity.

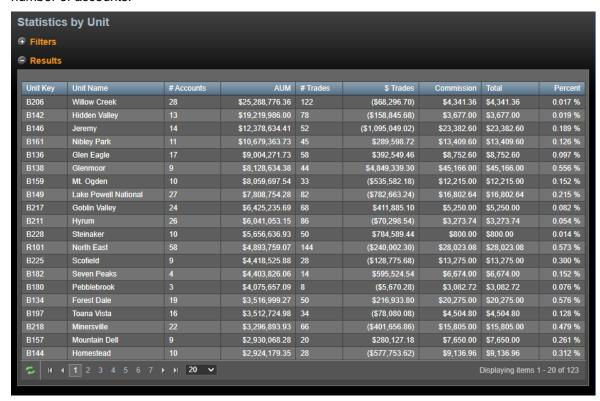
This report has an extensive list of filters to allow users to analyze trends of suppression across various account, product and trade characteristics.





4.13 Unit Statistics report

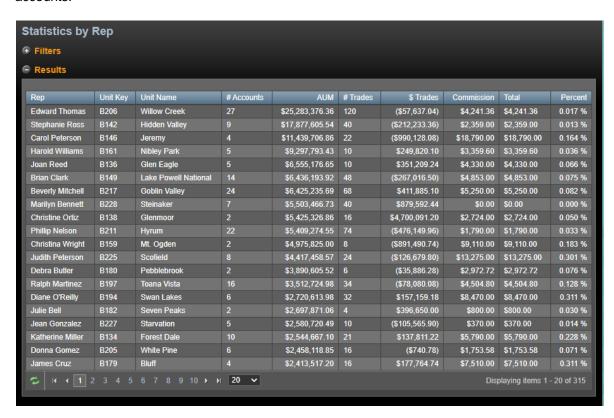
This report provides the list of top organization units as measured by AUM, trading activity and number of accounts.





4.14 Rep Statistics report

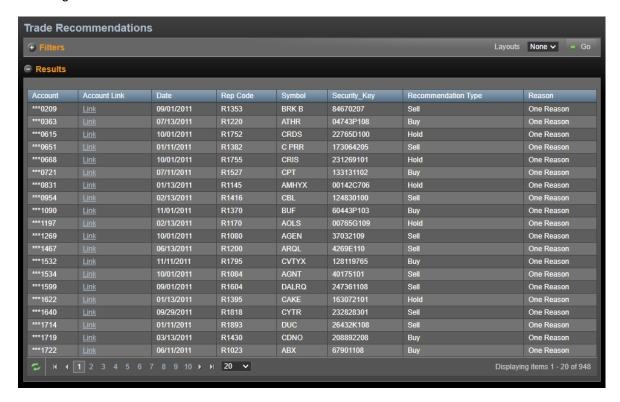
This report provides the list of top reps as measured by AUM, trading activity and number of accounts.





4.15 Trade Recommendations report

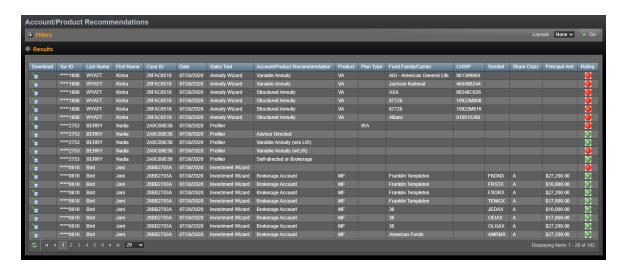
This report provides a consolidated view of all trade recommendations (Buy/Sell/Hold) for an account for firms that feed this data to the system. Because not all recommendations result in trades, they are captured separately at the account level for a specific CUSIP or symbol. Reviewers using the report can quickly get a sense of the volume and type of recommendations being captured and which securities satisfy a firm's supervision and oversight responsibilities for ensuring recommendations are suitable in accordance with FINRA 2111.





4.16 Account/Product Recommendations report

This report provides a view of Account and Product purchase recommendations for that were made to the investor using one or more sales tools that feed recommendations data to Supervision Compliance Manager. Reviewers using the report can view numerous attributes about the account and/or product recommendations including product type, account type (e.g., brokerage vs advisory), share class (as applicable), and recommendation rating. From this report the user can also view the original illustration document provided to the investor (if provided by the sale tool) in its original form.

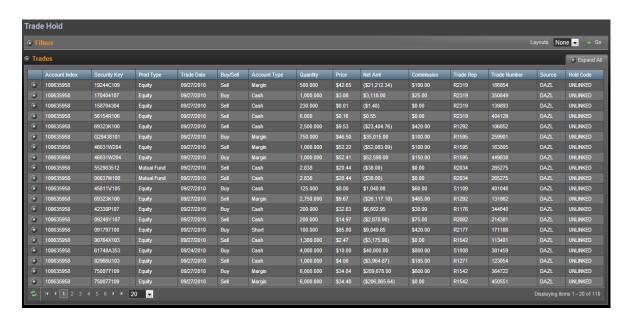


Data is available in this report only if the corresponding sales tool has been integrated into the system.



4.17 Trade Hold report

This report provides reviewers visibility into the trade hold table for researching the number and type of trades that have not been reviewed by the system due to the absence of links between external direct business trades and internal firm accounts and client suitability profiles. Effective suitability reviews cannot be performed without linkage to client suitability data. Risk is minimized by ensuring trades get linked correctly and are reviewed by the system. Reviewers can filter results using a variety of client, account, trade, and hierarchy filter criteria to prioritize unlinked trades that present the highest risk.



5 Inquire

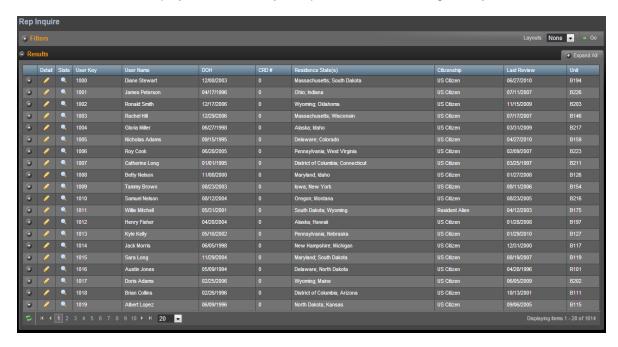
5.1 Rep Inquire

Part of the **Rep Review** module, the **Rep Inquire** screens are designed to give users an up-to-date snapshot of each of the firm's reps and their business activity.

Within the Rep Review screens (i.e., Rep Risk Rank and Rep Inquire), the term *rep* is used to denote a person—whereas in other parts of the application, *rep* may refer to a rep code. Within the hierarchy data, persons are known as *users*; and in the context of Rep Review, *rep* is intended to mean a *user* that is assigned to one or more rep codes under which the person transacts business (in contrast to other system users who do not transact business; e.g., compliance personnel or system administrators). Each row on **Rep Rank** and **Rep Inquire** represents a *rep* user; and the details provided for the user include all business done under any rep code(s) under which the *rep* user can transact business.



Rep Inquire provides a select set of information about reps and includes links by which to navigate to detail screens that display a broader array of rep information including activity statistics.



5.1.1 Filtering Rep Inquire

Rep Inquire includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Click next to Filters to display the available filter criteria. (For more information on using filters, see *FIS Compliance Suite Platform User Guide.*)

All review results can be viewed in detail on the **Rep Inquire Detail** screen by clicking of for the rep. (For more information on viewing the rep detail, see <u>Rep Inquire Detail</u>.) Reps activity statistics can be viewed in detail on the **Rep Inquire Statistics** screen by clicking for the rep. (For more information on viewing the rep statistics, see <u>Rep Inquire Statistics</u>.)

Rep Inquire Filters

Below is the list of individual filters available on **Rep Inquire** with related information.

Filter Name	Functionality
Rep-Related Filters	
User Name	Filters for reps by rep name.
User Key	Filters for reps user key.
CRD#	Filters for reps by CRD #.
Rep Type	Filters for reps by type of rep.
Residence State	Filters for reps by state in which the rep has an address.
License	Filters for reps by FINRA license held.
Registration	Filters for reps by state in which the rep is registered to
	operate.
Citizenship	Filters for reps by citizenship status.



Cartification Filters for rope by industry contifications hold	
CertificationFilters for reps by industry certifications held.	
DOH Filters for reps by date of hire.	
Degree Filters for reps by highest degreed education level complete	ed.
Disciplinary Filters for reps by disciplinary status.	
Annual Review Filters for reps by date of last annual review.	
Position-Related Filters	
All filters refer to holdings (positions) within the accounts of the rep's clients	
Product Filters for reps by product type of client account holdings.	
Sub Product Filters for reps by sub-product type of client account holding	gs.
Symbol Filters for reps by symbol of client account holdings.	
CUSIP Filters for reps by CUSIP of client account holdings.	
Underlying CUSIP Filters for reps by CUSIP of the security that underlies the	
options of client account holdings.	
Desc Filters for reps by description/name of client account holding	ngs.
Carrier Filters for reps by fund family or insurance carrier.	
Share Filters for reps by mutual funds share class of client account	nt
holdings.	
Muni State Filters for reps by the state that issued the municipal bond	s of
client account holdings.	
Industry Filters for reps by the industry of client account holdings.	
Price Filters for reps by the unit price of client account holdings.	
Rating Filters for reps by the bond rating of client account holding	3.
Hierarchy-Related Filters	
The Type, Unit, and Trader filters allow a user to drill down to a specific level in the compan	y's
hierarchy. This can be done by selecting from the drop-down list or by directly entering a ur	
rep number in the provided text boxes. Only those selections that fall into the user's hierarc	hy
display in the drop-down boxes.	
Type Filters for reps by the unit type or level of the executing rep).
Unit Filters on reps by the unit of the executing rep.	
Trader Filters on reps by executing rep. The rep can be identified	
either by selecting the rep from the list or by entering the re	ер
code in the free-entry field.	
As See FIS Compliance Suite Platform User Guide.	
Depth See FIS Compliance Suite Platform User Guide.	
User Filters for rep by rep code for all rep codes associated with	the
specified user key.	

5.1.2 Rep Inquire Detail

The **Rep Inquire Detail** screen displays a snapshot of the rep and the rep's activities, including:

- Rep Profile
- User
- Logins
- Roles
- Proxies
- Managed Units
- Unit Manager

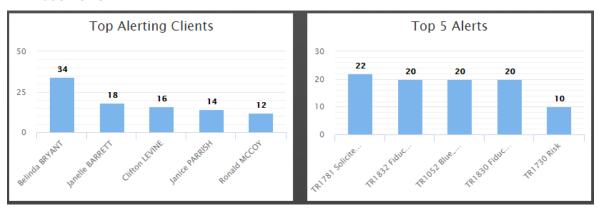


- Annual Review
- Address
- Phone
- Rep Codes
- Licenses and Registrations
- Insurance Appointments
- Customer Complaints
- Outside Business
- Outside Accounts
- Training and Certifications
- Education
- · Rep Notes.

5.1.3 Rep Inquire Statistics

This section displays summary information on the rep's trades and reviews. Charts include:

Trade Review:



This section displays summary information on the rep's trades and reviews:

- Maximum and average age and maximum and average number of actions taken on trades whose reviews are not yet complete
- Maximum and average age and maximum and average number of actions taken on trades from the past 12 months whose reviews are complete
- An overview of the number of trades and the number of red, yellow and green trades, monthly, for the past 12 months
- The top 5 clients in terms of whose trades have caused the largest number of issues
- The top 5 alerts that have fired within the trade review module.



Account Rank Review:



This section displays summary information on the reviews done on a rep's accounts:

- Maximum and average age and maximum and average number of actions taken on account rank reviews which are not yet complete
- Maximum and average age and maximum and average number of actions taken on account rank reviews from the past 12 months where the reviews are complete
- An overview of the number of accounts and the number of Flagged and Flagged/Elevated accounts—monthly—for the past 12 months
- The average rank score assigned to the rep's accounts and the average across the firm
- The top 5 alerts that have fired within the account rank review module
- The top 5 accounts in terms of risk score
- The top 5 accounts in terms of commission velocity (total commissions divided by assets held)
- Monthly commission velocity across all accounts, for the past 12 months for both the rep and the entire firm
- The top 5 accounts in terms of turnover (amount both bought and sold divided by assets held)
- Monthly turnover across all accounts, for the past 12 months for both the rep and the entire firm



- The top 5 accounts in terms of market value loss (net deposits and withdrawals)
- Monthly market value loss across all accounts, for the past 12 months for both the rep and the entire firm.

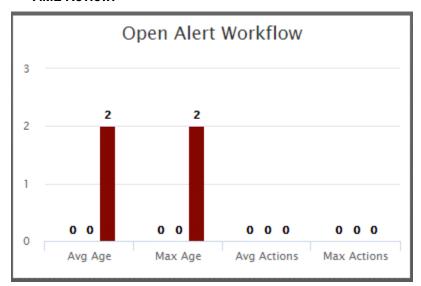
Rep Rank Review:



This section displays summary information on the reviews done on a rep's business:

- The rank score assigned to the rep and the average across the firm
- The top 5 alerts that have fired within the rep rank review module
- The total assets under management and commission for the rep, monthly over the past 12 months.

AML Review:

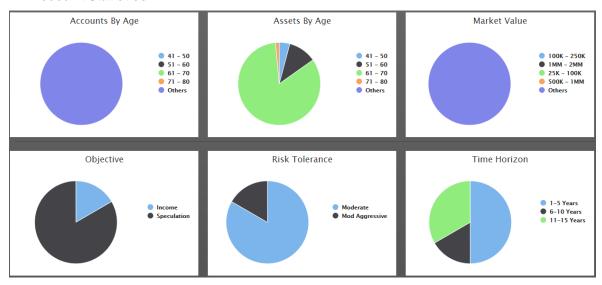




This section displays summary information on the reviews done on a rep's business:

- Maximum and average age and maximum and average number of actions taken on alerts whose reviews are not yet complete
- Maximum and average age and maximum and average number of actions taken on alerts from the past 12 months whose reviews are complete
- An overview of the number of trades and the number of red and yellow alerts, monthly, for the past 12 months
- The top 5 deposits
- The top 5 withdrawals.

Account Statistics:

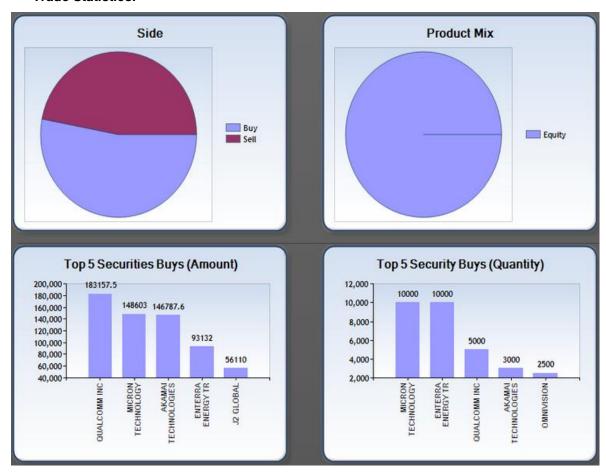


This section displays summary information on the accounts for which the rep is responsible:

- Accounts by age of the account holder
- Accounts by risk tolerance
- Accounts by primary investment objective
- · Accounts by time horizon
- · Accounts by managed type
- Accounts by nature
- Accounts by plan type
- · Accounts by residence country of the account holder
- Accounts categorized by market value of assets in the account
- Account assets categorized by the age of the account holder.



Trade Statistics:

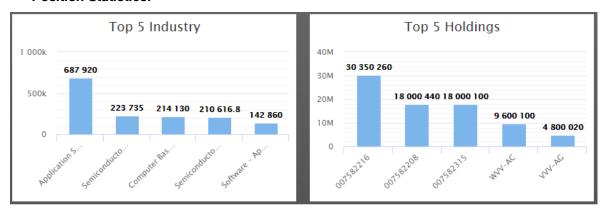


This section displays summary information on the accounts for which the rep is responsible:

- Trades by side
- Trades by product type
- Total trades by product type, per month for 12 months
- Top 5 purchased securities, by amount (12 months)
- Top 5 purchased securities, by quantity (12 months)
- Top 5 purchased low priced equities (12 months)
- Mutual fund purchases by share class
- Trades by solicited indicator
- Total trade amount and count, per month for 12 months
- Total commissions and count, per month for 12 months.



Position Statistics:



This section displays summary information on the accounts for which the rep is responsible:

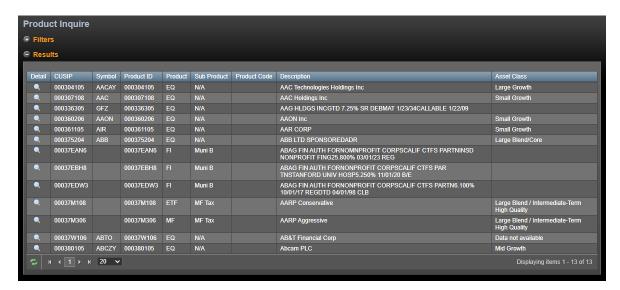
- Positions/holdings by industry
- Positions/holdings by product type
- Mutual fund positions/holdings by share class
- Top 5 mutual fund families
- · Top 5 holdings.

5.2 Product Inquire

The **Product Inquire** screen provides visibility to key information about products that are stored in the Security Master. By providing a rich of set of information about products, the screen also supports analysis of the product from the standpoint of relative product risk and complexity. Finally, **Product Inquire** provides a mechanism by which relative product risk and complexity can be rated by the user for each product.

Product Inquire provides a select set of information about products in the security master and includes links by which to navigate to a detail screen that displays a broader array of product information.





All products can be viewed in detail on the **Product Inquire Detail** screen by clicking \(\bigcirc\) for the product. (For more information on viewing the product detail, see \(\bigcirc\) reduct Inquire \(\bigcirc\) Detail.)

5.2.1 Filtering Product Inquire

Product Inquire includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)



Product Inquire Filters

Below is the list of individual filters available on **Product Inquire** with related information.

Filter Name	Functionality
Product-Related Filters	
CUSIP	Filters for products by CUSIP.
Symbol	Filters for products by ticker symbol.
Product ID	Filters for products by unique product identifier. Each
	product record is assigned a unique ID by the system.
Product	Filters for products by product type.
Sub Product	Filters for products by sub product type.
Product Code	Filters for products by the product code that is
	proprietary to the data source.
Description	Filters for products by the product description.
Asset Class	Filters for products by mutual fund share class.



Risk Rating	Filters for products by relative risk rating.
Complexity Rating	Filters for products by relative complexity rating.

5.2.2 Product Inquire Detail

The user can access the **Product Inquire Detail** screen by clicking \(\bigcirc\) for any product in the search results on **Product Inquire**.

Product Inquire Detail displays select information on the product to provide visibility to the attributes of the product on which alert rules within other modules are based.

Below is a list of sections that are provided on **Product Inquire Detail**:

- Applicable Breakpoints
- Blue Sky State(s)
- Product
- Risk and Ratings
- Stock Sector
- User-Defined Attributes.

5.2.3 Applicable Breakpoints

This section displays the sales load rate breakpoint values associated with the product. These values are provided for mutual fund and unit investment trust products.

5.2.4 Blue Sky State(s)

This section displays the states and territories in which the product is registered.

5.2.5 Product

This section displays key information about the product including, among other elements, the CUSIP, Symbol, Primary Exchange, Product Type, Asset Class, Share Class, and Fund Family. (Note: Some of the data elements in this section are displayed only as applicable according to the Product Type.)

5.2.6 Risk and Ratings

This section displays select attributes that are intended to support analysis of a product from the standpoint of product risk and complexity.

5.2.7 Stock Sector

This section displays the distribution of a product across industry sectors.



5.2.8 User-Defined Attributes

This section displays the Risk Rating and Complexity Rating values that have been either manually entered or loaded into the system from an external source.

6 Audit

The Audit module provides summary holdings and trading activity for all accounts—aggregated by firm-defined hierarchy. These functions are provided within Audit: Holdings, Holdings Detail, Activity, Activity Detail, Balances, and Balances Detail. The holdings screens provide a consolidated, aggregated view of all the holdings at the firm—organized and presented by firm-defined hierarchy. The activity screens provides a consolidated, aggregated view of all transaction activity in the system—including all cash and security movements—organized by firm-defined hierarchy. The balance screens provide a consolidated, aggregated view of account balances; the data on these screens can be sorted by any of the columns to show largest account, largest holding, or largest concentration among other details.

The sections below describe the functionality in more detail.

6.1 Holdings

The **Holdings** screen presents aggregated holdings and account statistics; it includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. From this screen the supervisor is able to see aggregated holdings information about all accounts assigned to him/her within the hierarchy.

6.1.1 Balance Stats

This section displays the aggregated equity, market value, cash and margin balance as it relates to the filtered view within the Position Summary section.

Balance statistics are available down to the rep Level. Selected filters are not applied to the balance statistics calculation. For example, filtering by product type Equity does not display balances for just equities.

6.1.2 Activity Stats

This sections displays the percentage of turnover, velocity, total commissions, total managed fees, total compensation and total row count as it relates to the view level within the Activity Summary section.

6.1.3 Positions Summary

The Positions Summary section shows all the positions—aggregated at the unit level. Information displayed includes the unit, position type, product type of the holding, security symbol, security name/description, aggregated quantity, average price and aggregated market value.



The Unit column acts as a hyperlink to display the Positions Summary by organization unit. Clicking returns to the previous hierarchy level. The user can also navigate directly to Positions Detail by clicking on the Count column.

6.2 Holdings Detail

The **Holdings Detail** screen shows detailed account position records. Information displayed includes the account rep of record, client name, account number, product type, stock symbol, product description, aggregated quantity, average price, and aggregated market value.

6.2.1 Filtering Holdings

Audit Holdings and **Holdings Detail** include a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. Except where noted, the same set of filters exists on both the Summary and Detail screens. (For more information on using filters, see *FIS Compliance Suite Platform User Guide.*)

Holdings Filters

Below is the list of individual filters available on **Audit Holdings and Holdings Detail** with related information.

Filter Name	Functionality
Account-Related Filters	
Account	Filters for holdings by account number.
Open Date	Filters for holdings by date the account was opened.
Fee	Filters for holdings identified as fee based.
Plan	Filters for holdings by qualified plan type.
Managed	Filters for holdings identified as managed. A managed account is one in which the primary account holder has delegated to an
	account manager rights to trade in any security that fits the investment profile of the account.
Citizenship	Filters for holdings by the primary account holder's citizenship status.
Country	Filters for holdings by the primary account holder's country.
Name	Filters for holdings by account name.
Tax ID	Filters for holdings by the primary account holder's tax ID.
Age	Filters for holdings by the primary account holder's age.
Time Horizon	Filters for holdings by the primary account holder's time
	horizon.
Managed Type	Filters for holdings designated <i>managed</i> as part of the selected managed program type.
Objective	Filters for holdings by the primary account holder's investment
D'al	objective.
Risk	Filters for holdings with the risk tolerance level(s) selected of the primary account holder.
Disc Acct	Filters for holdings identified as discretionary. A discretionary
	account is one in which the primary account holder has given
	the registered representative discretion to place trades without
	prior approval.
Employee	Filters for employee holdings.
Reg Type	Filters for holdings by account registration type.



Risk Rank	Filters for holdings by the primary account holder's assigned	
	risk value. (Risk values are assigned and provided by each	
	firm as part of the nightly data feed).	
Holding-Related Filters		
Product Type	Filters for holdings by product type.	
Share Class	Filters for holdings by mutual fund share class.	
Desc	Filters for holdings by entering the security name.	
Symbol	Filters for holdings by ticker symbol.	
CUSIP	Filters for holdings by CUSIP.	
Underlying CUSIP	Filters for option holdings based on the underlying CUSIP of the option.	
Primary Exch	Filters for holdings by the primary exchange on which the	
-	security is traded as indicated on the master product	
	information.	
Security	Filters for holdings by Security Key value. Security Key is an	
	internal system key used to navigate from Holdings Summary	
	to Holdings Detail . The value is typically a CUSIP; however,	
	since CUSIP is not universal to all products, the value may be	
	something other than CUSIP. Upon linking from Summary to	
	Detail holdings, the security filter auto-fills with the security key	
	of the specific holding.	
Quantity	Filters for holdings by quantity.	
Amount	Filters for holdings by market value.	
Position Type	Filters for holdings by position type.	
Trans Type	Filters for transactions by the type of transaction. (Exists only on Holdings .)	
Trans Date	Filters for transactions by the trade date. (Exists only on	
	Holdings.)	
Hierarchy-Related Filters		
	rs allow a user to drill down to a specific level in the company's	
	selecting from the drop-down list or by directly entering a unit or	
	boxes. Only those selections that fall into the user's hierarchy	
	display in the drop-down boxes.	
Туре	Filters for holdings by the unit type or level of the executing rep.	
Unit	Filters for holdings by the unit of the executing rep.	
Rep	Filters for holdings by executing rep. The rep can be identified	
	either by selecting the rep from the list or by entering the rep	
	code in the free-entry field.	
As	See FIS Compliance Suite Platform User Guide.	
Depth	See FIS Compliance Suite Platform User Guide.	
User	Filters for holdings by executing rep code for all rep codes	
	associated with the specified user key.	

6.3 Activity

The **Activity** screen includes summary-level activity and activity detail. **Activity** displays all transactions—including trade and non-trade (i.e., cash and deliver) activity—aggregated by firm hierarchy. (Note: typically the data are loaded into the system on at T+1 basis.)



The Filters on **Activity** are the same as on **Activity Detail**. (For information on the filters, see <u>Activity Detail</u>.)

6.3.1 Balance Stats

This section displays the aggregated equity, market value, cash and margin balance as it relates to the filtered view within the Activity Summary section.

Balance statistics are available down to the Rep Level. Selected filters are not applied to the balance statistics calculation. For example, filtering by product type Equity does not display balances for just equities.

6.3.2 Activity Statistics

This sections displays the percentage of turnover, velocity, total commissions, total managed fees, total compensation and total row count as it relates to the view level within the Activity Summary section.

6.4 Activity Detail

The **Activity Detail** screen shows the individual trade and non-trade (cash and deliver) transactions at the account level sorted by rep.

6.4.1 Filtering Activity

Activity and **Activity Detail** include a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. The same set of filters exists on both the Summary and Detail screens. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)

Activity Filters

Below is the list of individual filters available on **Activity and Activity Detail** with related information.

Filter Name	Functionality
Account-Related Filters	
Account	Filters for transactions by account number.
Open Date	Filters for transactions by date the account was opened.
Fee	Filters for transactions in accounts identified as fee based.
Plan	Filters for transactions in accounts of a specific qualified plan
	type.
Managed	Filters for transactions in accounts identified as managed. A
	managed account is one in which the primary account holder
	has delegated to an account manager rights to trade in any
	security that fits the investment profile of the account.
Citizenship	Filters for transactions by the primary account holder's
	citizenship status.
Country	Filters for transactions by the primary account holder's country.
Name	Filters for transactions by account name.



Toy ID	Filters for transactions by the primary assault holder's tax ID
Tax ID	Filters for transactions by the primary account holder's tax ID.
Age	Filters for transactions by the primary account holder's age.
Time Horizon	Filters for transactions by the primary account holder's time
	horizon.
Managed Type	Filters for transactions in accounts designated as <i>managed</i> as
Obligation	part of the selected managed program type.
Objective	Filters for transactions in accounts by the primary account
D'al	holder's investment objective.
Risk	Filters for transactions in accounts by the primary account
Diag Aget	holder's risk tolerance level.
Disc Acct	Filters for transactions in accounts identified as discretionary.
	A discretionary account is one in which the primary account
	holder has given the registered representative discretion to
Face Land	place trades without prior approval.
Employee	Filters for transactions in employee accounts.
Reg Type	Filters for transactions in accounts by account registration type.
Risk Rank	Filters for transactions by the primary account holder's
	assigned risk value. (Risk values are assigned and provided
	by each firm as part of the nightly data feed).
Product/Transaction-Re	
Product Type	Filters for transactions by product type.
Share	Filters for transactions by mutual fund share classes.
Desc	Filters for transactions by entering the security name.
Symbol	Filters for transactions by ticker symbol.
CUSIP	Filters for transactions by CUSIP.
Underlying CUSIP	Filters for options transactions in the specified underlying CUSIP.
Primary Exch	Filters for transactions by the primary exchange on which the
,	security is traded as indicated on the master product
	information.
Security	Filters for transactions by Security Key value. The value is
•	typically the CUSIP; however, since CUSIP is not universal to
	all products, the value may be something other than CUSIP.
Quantity	Filters for transactions by trade quantity.
Amount	Filters for transactions by Amount.
Price	Filters for transactions by price.
Trans Date	Filters for transactions by transaction date. The date can be
	entered manually by clicking and selecting the date from
	the calendar. To select a date range, select >i< or <=> from
	the drop-down box and then enter the start and end dates
	using the calendar. If only the first date is entered, the search
	returns transactions from that date forward. Alternatively,
	select LIST from the operator drop-down and then select a date
	option from the list.



Hierarchy-Related Filters The Type, Unit, and Trader filters allow a user to drill down to a specific level in the company's hierarchy. This can be done by selecting from the drop-down list or by directly entering a unit or rep number in the provided text boxes. Only those selections that fall into the user's hierarchy display in the drop-down boxes.	
Туре	Filters for transactions by the unit type or level of the executing
	rep.
Unit	Filters on transactions by the unit of the executing rep.
Trader	Filters on transactions by executing rep. The rep can be
	identified either by selecting the rep from the list or by entering
	the rep code in the free-entry field.
As	See FIS Compliance Suite Platform User Guide.
Depth	See FIS Compliance Suite Platform User Guide.
User	Filters for transactions by executing rep code for all rep codes

associated with the specified user key.

6.5 Balances

The **Balances** screen within **Audit** provides users with a consolidated, aggregated view of account balances across the levels of hierarchy. Balances for market value, cash, equity and margin are summed within the appropriate level of the hierarchy and displayed to provide a peer review across regions, branches, and down to registered representation.

The filters on **Balances** are the same as on **Activity**. (For information on the filters, see Activity Detail.)

6.6 Balances Detail

The **Balances Detail** screen within **Audit** provides compliance, supervisors and internal auditors a view into individual accounts and their balances organized by registered representative.

6.6.1 Filtering Balances Detail

Balances Detail includes a default set of filters to support flexible searching of review results. Users can rearrange and/or configure a subset of those filters for use in daily activities. (For more information on using filters, see *FIS Compliance Suite Platform User Guide*.)

Balances Detail Filters

Below is the list of individual filters available on Balances Detail with related information.

Filter Name	Functionality
Account-Related Filters	
Account	Filters for transactions by account number.
Open Date	Filters for transactions by date the account was opened.
Fee	Filters for transactions in accounts identified as fee based.
Plan	Filters for transactions in accounts of a specific qualified plan
	type.



Managed	Filters for transactions in accounts identified as managed. A managed account is one in which the primary account holder has delegated to an account manager rights to trade in any
Citizenship	security that fits the investment profile of the account. Filters for transactions by the primary account holder's
	citizenship status.
Country	Filters for transactions by the primary account holder's country.
Name	Filters for transactions by account name.
Tax ID	Filters for transactions by the primary account holder's tax ID.
Age	Filters for transactions by the primary account holder's age.
Time Horizon	Filters for transactions by the primary account holder's time horizon.
Managed Type	Filters for transactions in accounts designated as <i>managed</i> as part of the selected managed program type.
Objective	Filters for transactions in accounts by the primary account holder's investment objective.
Risk	Filters for transactions in accounts by the primary account holder's risk tolerance level.
Disc Acct	Filters for transactions in accounts identified as discretionary. A discretionary account is one in which the primary account holder has given the registered representative discretion to place trades without prior approval.
Employee	Filters for transactions in employee accounts.
Reg Type	Filters for transactions in accounts by account registration type.
Risk Rank	Filters for transactions by the primary account holder's assigned risk value. (Risk values are assigned and provided by each firm as part of the nightly data feed).
Hierarchy-Related Filters The Type, Unit, and Trader filters allow a user to drill down to a specific level in the company's hierarchy. This can be done by selecting from the drop-down list or by directly entering a unit or rep number in the provided text boxes. Only those selections that fall into the user's hierarchy display in the drop-down boxes.	
Туре	Filters for transactions by the unit type or level of the executing rep.
Unit	Filters on transactions by the unit of the executing rep.
Trader	Filters on transactions by executing rep. The rep can be identified either by selecting the rep from the list or by entering the rep code in the free-entry field.
As	See FIS Compliance Suite Platform User Guide.
Depth	See FIS Compliance Suite Platform User Guide.
User	Filters for transactions by executing rep code for all rep codes associated with the specified user key.
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