

APPENDIX US-3

Deloitte Tracking & Trading System Reporting Requirements

[Issued on July 16, 2021] [Amended on December 10, 2021]

Introduction

This appendix is intended to supplement the Member Firm's independence policies in [Section 10320](#). Certain terms, as defined in Section 10320, have a precise meaning and are capitalized whenever they are used.

Executive Summary

The Member Firm has implemented the Deloitte Tracking & Trading System to enable the Member Firm and its personnel to monitor compliance with certain independence requirements (refer to [paragraphs 9.30a-9.31](#)). This appendix provides requirements and guidance to the Member Firm and its personnel who are required to establish and maintain a Deloitte Tracking & Trading System portfolio (i.e., Partners and Professional Staff and other individuals as indicated on [My Compliance Dashboard](#) on DeloitteNet), with specific guidance on the requirements to report attributable Financial Relationships in accordance with [paragraphs 2.81-2.82](#).

Questions regarding responsibilities to comply with independence policy can be directed to the Compliance HelpDesk at 1-877-TO-CMPPLY (877-862-6759), the [Independence & Conflicts Network](#), the local Professional Practice Director, or the applicable Functional Risk Manager. The online [Independence Self-Audit Tool](#) provides tips and guidance for Partners and Professional Staff to easily identify their attributable personal Financial Relationships by answering a series of questions; however, it does not supersede policies in [Section 10320](#) or this appendix in cases when differences may occur. Information on how to use the Deloitte Tracking & Trading System can be accessed on the [Deloitte Tracking & Trading System](#) page on DeloitteNet.

Attributable Financial Relationships

Financial Relationships held by a Partner, Professional Staff member, or any of that individual's Immediate Family Members are attributable to the Partner or Professional Staff member and are required to be entered into the Deloitte Tracking & Trading System according to the guidelines in this appendix and Section 10320 (see [paragraphs 2.82-82a](#) and [8.46w](#)).

Other Financial Relationships that are controlled by the Partner, Professional Staff member, or any of that individual's Immediate Family Members may be attributable to the Partner or Professional Staff member, and thus are also required to be entered into the Deloitte Tracking & Trading System according to the guidelines in this appendix and Section 10320 (see [paragraphs 2.82-82a](#) and [8.46w](#)), including:

- Trusts — Assets held in a trust established or controlled/influenced by the Partner, Professional Staff member, or any of that individual's Immediate Family Members. Acting as a Trustee for a trust will cause all of the assets held in that trust to be attributable to the Partner or Professional Staff member (see [paragraphs 2.33a-36](#) and [8.29t-30d](#)).
- Executed Power of Attorney — Any Financial Relationships resulting from an executed power of attorney in which a financial institution has recognized the authority of the Partner, Professional Staff member, or any of that individual's Immediate Family Members granted by the power of attorney to direct, control, or manage a Financial Relationship, regardless of whether the individual exercises their authority over the Financial Relationships (see [paragraphs 2.37e](#) and [8.30i](#)).
- Estates — Estates for which the Partner, Professional Staff member, or any of that individual's Immediate Family Members are named the executor and are currently acting in that capacity (see [paragraphs 2.33a-36](#) and [8.30c-30d](#)).
- Inheritance — Assets related to an inheritance received or controlled by the Partner, Professional Staff member, or any of that individual's Immediate Family Members (see [paragraphs 2.28-31](#) and [8.31-32](#)).
- Closely Held Investments — Closely held investments (such as Financial Relationships of a medical practice, law firm, or business) held or influenced by the Partner, Professional Staff member, or any of that individual's Immediate Family Members based on their role or investment in the business (see [paragraph 2.41a](#) and [8.32b](#)).

Reportable Financial Relationships

The following table is a summary of attributable Financial Relationships and deadlines for reporting. Some attributable Financial Relationships are not reportable in the Deloitte Tracking & Trading System, as noted below, but may require the Partner or Professional Staff member to self-monitor independence and consult [Section 10320](#), as appropriate.

The deadlines provided below are for new Financial Relationships established by the Partner, Professional Staff member, or any of that individual's Immediate Family Members after the Partner's or Professional Staff member's first 28 days with the Member Firm. Newly hired, newly admitted, or newly promoted Partners and Professional Staff, as well as others for whom establishing a Deloitte Tracking & Trading System portfolio is a new requirement (e.g., elevated Independence ruleset), will have approximately 28 days to initially populate the Deloitte Tracking & Trading System, following the guidelines provided by the [Independence & Conflicts Network](#).

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|---|--|
| <p>The Financial Relationships in this section are required to be reported in the Deloitte Tracking & Trading System within 10 days of establishing the Financial Relationship, or when the item becomes attributable to the Member Firm, Partner, or Professional Staff member (see paragraphs 2.81-82a).</p> | | |
| Accounts | | |
| <p>Report Securities Accounts,¹ which may include but are not limited to:</p> <ul style="list-style-type: none"> • Brokerage accounts. • Trading apps (such as Robinhood, SoFi, and WeBull). • Individual Retirement Account (IRA) or other retirement accounts. • Self-directed and advised brokerage accounts. • Trust accounts, including any brokerage accounts held within the trust. • Deloitte Wealth Advisory Program (DWealth) accounts. • Dematerialized (Demat)/trading accounts. • Securities Account associated with a health savings account² (HSA) not offered by the Member Firm. • UTMA/UGMA account established or controlled by the individual or Immediate Family Member.³ • Brokerage accounts established through a 401(k) plan, 457 plan, 403(b) plan, or Keogh plan. • Brokerage accounts established as a result of opening a high-yield savings/checking account. | <p>Each individual account and account number must be reported separately even if held with the same financial institution.</p> <p>All public and Private⁴ Investments held in the accounts are reportable per the guidelines in subsequent sections of this document.</p> | <p><u>Do not report:</u></p> <ul style="list-style-type: none"> • Advisor or clearing agent. • Administrator of a benefit plan. • Flexible spending accounts. • Indian Asset Management Company accounts without any Demat/trading accounts. <p><u>Self-monitor but do not report:</u></p> <ul style="list-style-type: none"> • Commodity accounts (which do not offer the ability to acquire or hold other types of securities). • Foreign Exchange (Forex) accounts. |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|---|---|
| <ul style="list-style-type: none"> Foreign accounts such as Canadian Registered Retirement Savings Plan (RRSP) and Australian Superannuation. | | |
| <p>U.S. Mutual Fund distributor accounts with a Broker Data Import Program (BDIP) participating broker⁵ (including Individual Retirement Accounts (IRAs) established as mutual fund accounts).</p> | <p>All public and Private⁴ Investments held in the account are reportable per the guidelines in subsequent sections of this document.</p> <p><i>Note: All existing and new U.S. mutual funds are required to be held in a BDIP participating account, except as noted in footnote 5 below (see paragraph 2.70d). Report existing investments manually unless actively importing through a BDIP enrolled account.</i></p> | <p><u>Do not report:</u></p> <ul style="list-style-type: none"> U.S. mutual fund distributor accounts that cannot be BDIP-enabled. Non-U.S. mutual fund distributor accounts such as Indian Systematic Investment Plan (SIP) accounts. Online Indian mutual fund platforms without any Demat/trading accounts. |
| <p>Depository Relationships for which the following accounts are held, including, but not limited to, the following (including those denominated in a foreign currency):</p> <ul style="list-style-type: none"> Checking/savings accounts. Payment/salary accounts (common in India). India post office savings accounts. Money market accounts/certificates of deposit/fixed deposits/term deposits/time deposits. Depository accounts with an insurance company. | <p>The name of the financial institution as financial interest type: Depository Relationship.</p> <p>Report each depository institution as a Depository Relationship only once even if multiple accounts are held with the same institution.</p> <p>Report the depository institution that actually holds the cash balance.</p> | <p><u>Do not report:</u></p> <ul style="list-style-type: none"> Multiple Depository Relationships with the same entity when multiple accounts are held with the same institution. Online payment accounts such as Zelle and Paytm Wallet. Deposits held in escrow. |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|---|--|
| <ul style="list-style-type: none"> Cash balance associated with a health savings account² (HSA) not offered by the Member Firm. Paytm Bank account. | <p><i>Note: Report Depository Relationships with a broker as both a brokerage account and a Depository Relationship.</i></p> | <ul style="list-style-type: none"> Security deposits such as those associated with rental properties or properties under construction. Down payments. Indian Public Provident Fund. |
| <p>Digital Asset Wallet Hosting Services,⁶ including:</p> <ul style="list-style-type: none"> Wallets with a service provider with complete custody. Wallets with a service provider that hold partial custody, for example, by holding a minority of the keys required to execute a transaction. Wallets on a platform hosted on the internet and that do not purport to hold any keys of the Digital Asset. <p>The “Digital Asset Wallet Hosting Services” definition in Section 10320 describes wallet platforms specifically excluded from the definition.</p> | <p>Report each Digital Asset Wallet Hosting Service as a “Depository Relationship” only once even if multiple wallets are held with the same service provider.</p> <p>Report Digital Asset Wallet Hosting Services even if no Digital Assets are held in the hosted wallets.</p> <p><i>Note: Opening a Digital Asset Wallet Hosting Service with some entities will automatically cause a Securities account to be opened. Both the Wallet and the Securities Account are reportable. Digital Assets are required to be reported as “Private Investment or UIT”; see “Other Private Investments” below.</i></p> | <p><u>Do not report:</u> Multiple wallets with the same Digital Asset Wallet Hosting Service when multiple wallets are held with the same service provider.</p> |
| Education Savings Plans/Accounts | | |
| <p>529/529A plans</p> <ul style="list-style-type: none"> Including those held through a Upromise account. | <p>Each plan with a unique account number must be reported separately even if the name of the plan is the same.</p> | <p><u>Do not report:</u> Individual investments held in the plan or the associated brokerage account, if applicable.</p> |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|---|--|
| <ul style="list-style-type: none"> Prepaid tuition plan, including those purchased through the Member Firm or another employer. | | |
| Coverdell Educational Savings Account (ESA) — formerly an “education IRA.” | The account and any investments held in the account. | |
| Employee Benefit Plan Investments | | |
| <p>Individual public and Private⁴ Investments, including 401(k), 403(b), etc., held in an employee benefit plan with the current employer of the Partner’s or Professional Staff member’s Immediate Family Member.</p> <p><i>Note: Former employer benefit plans held by the Partner, Professional Staff member, or any of that individual’s Immediate Family Members must be rolled over to a current employer plan or BDIP participating IRA. Until rollover is complete, these investments and associated accounts, if any, must be reported.</i></p> | <p>Report public and Private⁴ Investments held in the plan. Partners and Professional Staff are encouraged to report investments in the brokerage account placeholder “Current Employer Benefit Plan.”</p> | <p><u><i>Do not report:</i></u> The name of the plan sponsor, advisor, or administrator. The Member Firm-sponsored 401(k) plan is centrally monitored; therefore, underlying investments in this plan are not reportable.</p> <p><u><i>Self-monitor but do not report:</i></u> Defined benefit plans such as a traditional pension plan for which there is no ability to select investments, including Indian Provident Funds and Atal Pension Yojana.</p> |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|--|--|
| Public and Private ⁴ Stocks (and Other Equity Investments) | | |
| Common and preferred stock/shares | <p>Report through an actively importing BDIP brokerage account.</p> <p>If not held in an importing brokerage account, report manually.</p> <ul style="list-style-type: none"> • Report all public stock as “Stock.” • Report all private equity as “Private Investment or UIT.” <i>(Note: UIT as used throughout this appendix is defined as Unit Investment Trust.)</i> | <p><u>Do not report:</u> Futures, commodities, and currency options unless tied to an entity that is, or could be, restricted.</p> <p><u>Self-monitor but do not report:</u>⁷ Options on indices — if not diversified, monitor for concentrations in Restricted Entities or Restricted Nonaudit Assurance Entities.</p> |
| Exchange-traded funds (ETFs) | | |
| Closed-end funds | | |
| <p>Shares held:</p> <ul style="list-style-type: none"> • In certificate form. • Through dividend-reinvestment plans (DRIPs). • Through direct stock-purchase plans (DSPs). • Directly through the transfer agent. | | |
| Options, puts, calls, and warrants — report the related stock. | | |
| Stock options and restricted stock units (RSUs), including those offered to an Immediate Family Member as a result of his/her employment — report the related stock. | | |
| Real estate investment trusts (REITs). | | |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|--|--|
| Deregistered securities no longer traded on any SEC exchange but actively trading on another exchange. | | |
| Public and Private ⁴ Bonds (and Other Debt Investments) | | |
| Quasi-government bills, bonds, and notes (such as Fannie Mae or Freddie Mac). | <p>Report through an actively importing BDIP brokerage account.</p> <p>If not held in an importing brokerage account, report manually.</p> <ul style="list-style-type: none"> Report corporate public bonds using a six-digit CUSIP followed by "000." Report all other public bonds using a full nine-digit CUSIP. <p>Report all public bonds as "Bond."</p> <p>Report all private debt as "Private Investment or UIT."</p> | <p><u>Do not report:</u></p> <ul style="list-style-type: none"> U.S. Government savings bonds (such as series E/EE, HH, and I Bonds). U.S. Treasury bills, bonds, and notes. Government of India savings bonds including Sovereign gold bonds, National savings certificate and Kisan vikas partra. |
| Corporate bills, bonds, debentures, and notes. | | |
| Structured products (also known as market-linked investments). | | |
| Non-U.S. Sovereign Debt. | | |
| <p>Private debt or lending arrangements (including investments made as a lender through a peer-to-peer arrangement*).</p> <p>*If you have borrowed through a peer-to-peer lending arrangement, refer to the Loans section of this document.</p> | <p>Report a "Private Investment or UIT" using the name of the entity to which you have made the Loan or the name of the peer-to-peer lending entity through which you made the Loan.</p> | <p><u>Do not report:</u> Loans made directly to individuals.</p> |

| Reportable Financial Relationships | Do Report | Do Not Report |
|--|---|---|
| Public and Private ⁴ Mutual Funds and Unit Investment Trusts (UITs) | | |
| Open-end mutual funds. | <p>Report through an actively importing brokerage account.</p> <p>If not held in an importing brokerage account, report manually.</p> <ul style="list-style-type: none"> Report all public mutual funds as “Mutual Fund.” Report all private mutual funds as “Private Investment or UIT” unless held as part of a variable insurance product or annuity (for these investments, follow the guidelines in the “Insurance with an Underlying Investment Component” section of this appendix). | <p><u>Do not report:</u> The underlying investments in the Member Firm 401(k) and/or profit-sharing plans.</p> <p><u>Self-monitor but do not report:</u> Donor-advised funds.</p> |
| Publicly or privately ⁴ traded mutual funds. | | |
| Money market funds, including non-FDIC-insured sweep vehicles. ⁷ | | |
| Funds held in brokerage sweep accounts. | | |
| Unit investment trusts (UITs). | Report the name of the sponsor of the UIT as “Private Investment or UIT.” | <p><u>Self-monitor but do not report:</u></p> <ul style="list-style-type: none"> Underlying investments. |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|--|---|
| Other Private Investments | | |
| Digital Assets ⁶ — All virtual assets (including cryptocurrencies, stable coins, and tokens) including, but not limited to, any digital representation of an equity stake, security, commodity, or utility regardless of its fungibility and whether its governance is decentralized or enterprise controlled. | Report all Digital Assets as individual “Private Investment or UIT.” | |
| National Pension Scheme (India) | Report National Pension Scheme as a private investment by the Tier 1 or Tier 2 fund manager. | |
| Crowdfunding platform (e.g., SeedInvest, WeFunder, OurCrowd). | Crowdfunding is reportable if you acquire a debt or equity interest, or a derivative of a debt or equity interest, in any partnership, corporation, or other legal entity as a consequence of participation. | Crowdfunding platforms that do not involve a debt or equity interest are not reportable (e.g., Kickstarter, GoFundMe, Patreon). These platforms may offer products or services but do not result in any Financial Interest. |
| Established non-public companies, partnerships, limited liability corporations (including your Immediate Family Member’s personal business, family business, start-up, investment in real estate or creation of a private company to invest in real estate with other individuals). | Report as individual “Private Investment or UIT.” | |

| Reportable Financial Relationships | Do Report | Do Not Report |
|--|---|--|
| Insurance with an Underlying Investment Component | | |
| Variable life insurance products and underlying investments,even if not publicly traded. | Report each insurance policy separately using the name of the underwriter. In the case of multiple policies issued by the same underwriter (even if the type of policyis the same), a separate entry for each policy is required. Report all underlying funds by using “add financial interest to insurance.” If the return is fixed, select “fixed return investment” as the underlyinginvestment. | <i><u>Do not report:</u></i> The agency or entity through which the policy was purchased. |
| Fixed and variable annuities (including variable annuities obtained through a group policy) and underlying investments,even if not publicly traded. | | |
| Unit-linked insurance plan (ULIP) and underlying investments,even if not publicly traded (Subtype: Variable Life). | | |
| Loans | | |
| <u>Home Loans</u> <ul style="list-style-type: none">Primary, secondary, or investment property mortgages.Home equity Loans and lines of credit, with or without an outstanding balance. | Report each Loan separately using the name of the entity that holds the Loan. In the case of multiple Loans held with the same entity, a separate entry for each Loan is required. | <i><u>Do not report:</u></i> <ul style="list-style-type: none">Auto/motorcycle Loans and Leases.401(k) Loans.Loan servicers.Partner capital and Memorandum of Agreement Retirement Enhancer (MoRE) Loans obtained through Member Firm-sponsored programs.Loans fully collateralized by the cash surrender value of |
| <u>Secured and Unsecured Loans</u> <ul style="list-style-type: none">Personal lines of credit.Loan or Lease for a recreational vehicle, boat, aircraft, or tractor.Personal bank Loan.Signature Loan. | It is common that payments are made to the servicer, not the owner of the Loan. It is recommended that the Partner, Professional Staff member, or any of that individual’s Immediate | |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|--|---|
| <ul style="list-style-type: none"> • Gaming Establishment Markers. • Loans against gold. • Loans obtained through a peer-to-peer lending arrangement.* *If you have invested through a peer-to-peer lending arrangement, refer to the Public and Private Bonds (and other debt investments) section of this document. • Loans obtained through partnerships/LLCs. | <p>FamilyMembers, as applicable, call their servicer to verify the owner of the Loan.</p> <p>If a Loan is sold to a new lender, the Partner or Professional Staff member must update their portfolio in the Deloitte Tracking & Trading System to reflect the new lender.</p> <p>Report Loans for which the Partner, Professional Staff member, or any of that individual's Immediate Family Members is the guarantor.</p> | <p>an insurance policy.</p> <ul style="list-style-type: none"> • Loans taken against an annuity that is owned. <p><u>Self-monitor but do not report:</u></p> <ul style="list-style-type: none"> • Consumer loans, including credit cardsand bank overdraft protection. • Loans obtained from individuals such as family members and friends. • Student Loans. |
| <p><u>Margin Arrangements and Loans</u></p> <p>Margin arrangements and/or margin Loans, including margin Loans from BDIP brokers:</p> <ul style="list-style-type: none"> • With or without an outstanding balance. • Even if the arrangement has never been borrowed against. | <p>Report the name of the entity (in most cases the clearing broker-dealer) with which the margin arrangement/margin Loan is held.</p> <p><i>Note: These arrangements will not import as part of BDIP.</i></p> | |

| Reportable Financial Relationships | Do Report | Do Not Report |
|---|--|---|
| <p style="text-align: center;">Insurance Policies</p> <p style="text-align: center;">Report any policy with an investment component as a variable or annuity product.</p> | | |
| <p><u>Property & Casualty Policies</u></p> <ul style="list-style-type: none"> • Auto/Motorcycle/Boat/Recreational Vehicle/Tractor/Equipment. • Homeowners/Renter/Landlord. • Wind/Earthquake/Flood (in excess beyond FEMA⁸). • Jewelry and/or collectibles, only if obtained from a different insurer than any homeowners insurance policy that has been reported. • Lender-placed insurance, also known as creditor-placed or force-placed insurance. • Umbrella liability. | <p>Report each insurance policy separately using the name of the underwriter.</p> <p>In the case of multiple policies issued by the same underwriter (even if the type of policy is the same), a separate entry for each policy is required. For vehicles, report a separate policy for each type of vehicle (i.e., one entry for all autos and a separate entry for RVs). For homeowners, report a separate policy for each property.</p> <p>Report policies acquired through the Liberty Mutual Group Savings Plus Program, even if purchased through the Member Firm.</p> | <p><u>Do not report:</u></p> <ul style="list-style-type: none"> • Agency or entity through which the policy was purchased. • Insurance products offered in connection with another financial product that the holder cannot opt-out of and did not pay for, such as identity theft insurance on a bank account and automatic life provided by credit unions/credit card companies. • Group term life or health policies with no individual underwriting (individual underwriting usually requires a health screening) (e.g., AICPA). • Other group policies for which individual underwriting is not required. • Member Firm group policies, even if individual underwriting is required (including PPMD umbrella policies). |
| <p><u>Health, Disability, Long-Term Care Policies</u> (individual, including discount plans offered by the Member Firm, that are not taken out as a group policy)</p> <ul style="list-style-type: none"> • Health/medical/vision/dental/disability/long-term care. • Accidental death and dismemberment. | | |
| <p><u>Life Policies</u></p> <ul style="list-style-type: none"> • Term/whole life. • Group universal variable life. • Automatic life in which the Partner, Professional Staff member, or any of that individual's Immediate Family Members "checked the box" to opt-in (Subtype is dependent on product type: Term, Whole, or Universal). • Universal life. • Mortgage life insurance (Subtype: Term). | | |

| | | |
|---|--|---|
| <ul style="list-style-type: none"> • Endowment insurance (Subtype: Term). | | <ul style="list-style-type: none"> • Private mortgage insurance (PMI) and title insurance. • Certain immaterial property and casualty policies, such as trip cancellation, travel, or lost baggage insurance; auto tire insurance; pet insurance; fraud/identity theft insurance; and cell phone insurance. • Group identity theft protection offered in response to a third-party data breach. • Home warranty, automobile warranty, product liability/warranty, extended warranties, and other immaterial service policies including those offered as part of property and casualty policies. |
| <p><u>Other Policies</u></p> <ul style="list-style-type: none"> • Business owner policy. • Workers' compensation. • Malpractice/professional liability/errors & omissions (E&O). • Business umbrella liability. • CPA/professional liability (not provided by the Member Firm). • Insurance to pay bills or other debt, most commonly in situations of illness or unemployment. | | |

1 Many of these accounts may be established as brokerage accounts. Brokerage accounts are FINRA-registered accounts established with a brokerage firm for which the Partner, Professional Staff member, or any of that individual's Immediate Family Members have the ability to invest broadly in any available security or asset type. Refer to [APR 420](#), *Mandatory Broker Data Import Program for Partners, Principals and Managing Directors Required to Maintain a Tracking & Trading Portfolio*, and [APR 125](#), *Mandatory Broker Data Import Program for Employees Required to Maintain a Tracking & Trading Account*, regarding the requirement to establish brokerage accounts with brokers that participate in the mandatory Broker Data Import Program (BDIP).

2 HSAs all offer a cash/savings account that may be held with a bank, credit union, as part of a brokerage account or through a high yielding insurance product. The entity that holds this cash balances should be reported as a depository relationship in T&T. Many also offer an account through which you can purchase investments. The entity that maintains custody of your investments should be reported as a securities account in T&T and all investments should also be reported.

3 UTMA/UGMA accounts opened by others for the benefit of the Partner's or Professional Staff member's Dependents are attributable to the Partner or Professional Staff member when custody of the assets is assumed by the Partner, Professional Staff member, or any of that individual's Immediate Family Members.

4 Even though Private Investments are required to be reported in the Deloitte Tracking & Trading System, the system does not have the ability to monitor Private Investments and confirm restrictions status, therefore, Private Investments are required to be self-monitored (see [paragraph 2.13](#)).

5 Funds owned prior to August 1, 2014, are grandfathered and may continue to be held directly with a mutual fund distributor that does NOT participate in BDIP except in cases in which a Partner or Professional Staff member was newly required to maintain a Deloitte Tracking & Trading System portfolio, hired, directly admitted as Partner, or promoted to the level of Manager or above (including all promotions to successively higher levels) on or after August 1, 2015.

6 Digital Assets and Digital Asset Wallet Hosting Services are required to be reported by Partners and Professional Staff within 10 days of acquiring the Digital Asset or establishing a wallet at a Digital

Asset Wallet Hosting Service (see [paragraph 2.82](#)). Report “Air drops” (e.g., those Digital Assets distributed into wallets free of charge) and “crypto dust” (e.g., a fractional Digital Asset value) in a Partner’s or Professional Staff member’s Deloitte Tracking & Trading System portfolio, regardless of their value. Due to the often involuntary nature of “air drop” Digital Assets, report these types of Digital Assets in the Deloitte Tracking & Trading System prior to the submission of the Partner’s or Professional Staff member’s next independence representation or audit checklist that follows the acquisition date.

7 Partners, Professional Staff, and any of that individual’s Immediate Family Members are encouraged to periodically reconcile the items importing with their statements. Private investments, CDs, sweep vehicles, and other reportable investments may not import even if held in a BDIP-enabled brokerage account. Self-monitoring is required for investments that are not reportable. If reportable, report the investment manually outside of the brokerage account.

8 For further information, see <http://www.fema.gov/national-flood-insurance-program>.