

Helpful Tips

The following helpful tips, broken down into ten categories, have been assembled to help you maintain your independence. Remember, protecting, preserving, and enhancing our reputation starts with you. Note that certain restrictions described may only apply if you are a Member or Covered Person with respect to the Restricted Entity. You should refer to the Independence Manual at DPM 10320 to gain a detailed understanding of your independence requirements.

Spouse/Spousal Equivalent

- Understand the definition of Spousal Equivalent (DPM 10320-5).
- Talk with your spouse/Spousal Equivalent on a regular basis regarding his/her Financial Relationships.
- Make sure that he/she is aware of how important it is for you to maintain your independence.
- Use the Independence for Spouses and Spousal Equivalents pages on DeloitteNet to help guide your discussions on independence with him/her and help him/her understand the bigger picture of why independence is a professional responsibility for those associated with an organization that includes a public accounting firm

Tracking & Trading portfolios (only for those with a T&T requirement)

- Enter all reportable Financial Relationships within ten calendar days of a transaction (e.g., acquisition, disposal, refinance, etc.).
- Remember to report loans and insurance products (these are often overlooked).
- Remember to report the Financial Relationships of yourself, your spouse/Spousal Equivalent, dependent(s) and any other holdings attributable to you (such as through a power of attorney, or as a trustee or executor of a trust or estate).

Brokerage accounts

- Do not open an account with a Restricted Entity broker-dealer or an account that clears through a Restricted Entity broker-dealer.
- Review your statements on a regular basis to make sure that the clearing broker has not changed to a Restricted Entity.
- Managers and above with a Tracking & Trading portfolio must report all brokerage accounts in their Tracking & Trading portfolio and enroll these brokerage accounts in the Broker Data Import Program (BDIP) (with limited exceptions).
- Those without a Tracking & Trading portfolio should consider opening any new accounts or moving existing accounts to a BDIP participating broker to be ready for their BDIP requirement once promoted to Manager.
- If you are required to close a brokerage account (with either a Restricted Entity broker-dealer or a nonparticipating BDIP broker-dealer), review subsequent statements to identify any future dividends that may have hit the account after your request to close. A small amount remaining in the account will keep the account from being properly closed.
- Review statements to identify “sweep” vehicles (an investment vehicle whereby funds that exceed a certain level are automatically transferred or “swept” into another

investment vehicle, typically to earn a higher rate of return), since mutual funds are also subject to the independence requirements.

- Publicly traded mutual funds used as sweep vehicles also need to be reported in your Tracking & Trading portfolio.

Managed accounts

- Professionals should not have a managed account relationship (or any account in which discretionary authority has been given to execute any transactions that may not comply with the independence policies of Deloitte applicable to the Professional), even if the broker-dealer is not a Restricted Entity.
- Accounts held by Partners, principals and directors through their enrollment in the Deloitte Wealth Advisory (DWealth) program comply with Deloitte's policies regarding managed accounts.

Mortgages

- Before obtaining a new loan, check DESC to determine whether the lender is restricted for you.
- Do not enter into an agreement with a mortgage broker if you don't know who is providing the loan.
- Be aware that refinancing a mortgage constitutes a new loan – you may not refinance your mortgage with a Restricted Entity that is restricted for you, even if your previous mortgage was with the same Restricted Entity and qualified for grandfathering.
- For Covered Persons, loans taken for investment properties or other loans not secured by your primary or other qualified residence are not eligible to be grandfathered.

Variable insurance & annuities

- Check DESC prior to taking out a variable insurance or annuity policy. These policies (including those for yourself, spouse/Spousal Equivalent, and dependents) cannot be taken with an entity which is restricted for you.
- If you identify that you have a variable insurance policy or annuity with an entity which is restricted for you, contact National Office (Independence) immediately.
- Variable policies and annuities are NOT eligible to be grandfathered.
- The underlying holdings of variable insurance products and annuities are considered direct Financial Interests and subject to your independence requirements. So even if the insurance company issuing the product/policy is not restricted, there could be restricted underlying holdings. Be sure to:
 - Check all public underlying holdings against DESC to see if they are restricted for you.
 - Analyze private funds for evaluation of the investment advisor/manager identified in the prospectus or fund sheet as well as the underlying holdings of the private fund to see if either is restricted for you.
 - Report all underlying holdings of the insurance product/policy, both public and private, in your Tracking & Trading portfolio.
 - Monitor these holdings on a regular basis.

Closely held investments*

*including, but not limited to, partnerships, limited liability companies, corporations that do not have a registered investment advisor and have less than 100 investors, investment clubs.

- Do not acquire a Financial Interest in a closely held investment with a Restricted Investor.
- Prior to investing in a closely held investment, determine if the closely held entity, the promoter, or general partner/managing member is a Restricted Entity.
- Prior to investing in a closely held investment, determine if there are significant transactions or activities between the closely held entity and a Restricted Entity (e.g., financing or investments).
- After acquiring a closely held investment, you have a continuing duty to monitor changes in the roles of other investors or changes in ownership of other interests on a regular basis. If you are unable or unwilling to determine that all the conditions are satisfied with respect to Restricted Entities (see DPM 10320), the investment is prohibited.
- If a closely held investment, regardless of its form (e.g., joint investment, partnership, investment club) or one or more of its general partners or managing members becomes a Restricted Entity for you, you should divest your interest.
- Because it can be difficult to divest a closely held investment, it is recommended you have an exit strategy in place in case you need to divest your interest (see DPM 10320 for examples of potential exit strategies for closely held investments).

Employee benefit plans

- Upon joining Deloitte, Professionals (including their spouse/Spousal Equivalent and/or dependents) should not continue to participate or maintain Financial Interests in prior employer benefit plans if they have the right to cease participation. See DPM 10320 and DPM 10320-7 for exceptions to this policy and additional guidance on the timing of plan divestitures. Contact National Office (Independence) for questions on this requirement.
- If you or your spouse/Spousal Equivalent have a prior employer 401(k) plan, roll it over into either a current employer benefit plan (such as the Deloitte 401(k) plan) or into an IRA at a BDIP participating broker to simplify your monitoring responsibilities and be in compliance with policy.
- Managers and above must enter all publicly traded underlying holdings of all non-Deloitte employee benefit plans into their Tracking & Trading portfolio. This applies to both you and your spouse/Spousal Equivalent's prior employer benefit plans (until they are rolled over as noted above) as well as any current employer benefit plans of your spouse/Spousal Equivalent.
- Regularly monitor any private holdings in your spouse/Spousal Equivalent's current employer benefit plans.
- Fund administrators often change available fund options and reallocate balances to new funds. Review these regularly so you will notice such changes.
- If you need to transfer out of a Restricted Entity investment, also change future allocations so that additional funds are not contributing to the Restricted Entity investment (i.e., two separate actions).

Trustees/Executors

- All of a trust/estate's assets and relationships are attributed to you as a direct Financial Relationship if you are the trustee/executor. Remember, all Financial Relationships attributable to you, including those in a trust/estate, are subject to the independence rules as if you owned them directly. Materiality is not a factor.

- Check all brokerage accounts and holdings against DESC to determine whether any are restricted for you.
- Managers and above must enter all reportable Financial Relationships into their Tracking & Trading portfolio and any brokerage accounts need to be enrolled in the BDIP.

Close Relative Employment

- If you have a Close Relative, as defined in DPM 10320-5, employed by a Restricted Entity, this should be discussed with National Office (Independence).
- Disclose this Employment relationship in your Representation on Independence, Ethics & Compliance.