

Attachment A

Product Codes

Select the most prominent in the complaint from the following codes.

Code	Description of Product	(Effective 7/18/2020)
00	Miscellaneous	
01	Equity-Listed (common and preferred stock, closed-end funds)	
02	Debt-Corporate (not asset-backed, includes convertible, corporate and zeros)	
03	Debt-U.S. Government/U.S. Government Agency/U.S. Government Zeros and U.S. Zeros Receipts (e.g., Treasury Investors Growth Receipt (TIGR), Certificate of Accrual on Treasury Securities (CATS))	
04	Commodities/Futures (except commodity options and financial futures)	
05	Commodity Options	
06	Options (except Index)	
07	Index Options	
08	Insurance (not annuities)	
09	Mutual Funds (open-ended, includes money market funds)	
10	Certificate of Deposit (CD) (coupon and zero CDs)	
11	Unit Investment Trusts (UITs) (corporate, government and municipal defined asset funds)	
12	Direct Investments (limited partnerships, etc.)	
13	Financial Futures	
14	Equity-OTC (common and preferred stock, new issues)	
15	Debt-Municipal – Such products may include municipal securities with underlying bonds, notes, zeros, warrants, Variable Rate Demand Obligations, Alternative Minimum Tax bonds, certificates of participation, private placement or direct purchases. However, they should not include Municipal Investment Trusts (see Code 11), Auction Rate Securities (see Code 39), or Structured Products (see Code 42).	
16	Debt-Asset Backed (Collateralized Mortgage Obligations (CMOs), credit card receivables, etc.)	
17	Managed/Wrap Accounts (in-house money manager)**	
18	No Product	
19	Managed/Wrap Accounts (outside money manager)**	
20	Variable Annuities - A variable annuity is an insurance company contract that allows the owner to elect to receive immediate or future periodic payments. A variable annuity is purchased, either with a lump sum or over time, with premiums allocated among various, separate account funds offered in the annuity contract. During the accumulation phase, the rate of return and the contract fund value on a variable annuity fluctuates with the performance of the underlying investments in the separate account funds, sometimes called investment portfolios or subaccounts.	
21	Warrants/Rights	
22	Real Estate Investment Trusts (REITS)	
23	Employee/Employer Stock Option Plans (not listed options)**	
24	Equity-Foreign	
25	Debt-Foreign	
26	Exchange Traded Funds (ETFs)	
27	Single Stock Futures	
28	529 Plans/Municipal Fund Securities (e.g., College Savings Plans, ABLE Accounts, and Local Government Investment Pools)**	
29	Hedge Funds	
30	Private Placements (e.g., Private Investments in Public Equity Securities (PIPES), etc.)	
31	Promissory Notes	
32	Mortgage (e.g., pledged assets, reverse mortgage)	
33	Closed End Funds	
34	Cash Management Accounts (e.g., debit/credit card)**	
35	Self-Directed Fee-Based Accounts (non-managed)**	
36	Contractual Plans/Systematic Investment Plans	

37	Tenant in Common (e.g., 1031 Exchanges)
38	Money Markets (e.g., commercial paper, Banker's Acceptance (BA), not money market funds) - When the matter is primarily related to money markets.
39	Auction Rate Securities – Municipal Debt
40	Auction Rate Securities – Corporate Debt
41	Auction Rate Securities – Closed-End Funds
42	Structured Products - For the purpose of this reporting, structured products are investment instruments designed to facilitate a particular risk-return objective, the performance of which is based on one or more referenced asset, index, interest rate, or other market measure. They may include floater or inverse floater features. Some structured products offer full protection of the principal invested, whereas others offer limited or no protection of the principal. Structured products may be listed on a securities exchange or traded in the over-the-counter market.
43	Fixed Annuities - A fixed annuity is an insurance contract that is purchased either in a lump sum or over time. A fixed annuity is credited with a fixed or set interest rate and allows the owner to elect to receive immediate or future periodic payments. The insurance company guarantees both earnings and principal.
44	Equity-Indexed Annuities - An equity-indexed annuity is an insurance company product purchased either in a lump sum or with a series of payments. The insurance company credits the holder with a return that is based on performance of an equity index, such as the S&P 500 Composite Stock Price Index. The insurance company may guarantee a minimum return. After the accumulation period, the insurance company makes periodic payments under the terms of the contract or in a lump sum.
45	Life Settlements - A life settlement is a financial transaction in which a policy owner sells an existing life insurance policy to a third party for more than the policy's cash surrender value, but less than the net death benefit.
46	Viatical Settlement - The sale of a terminally ill policy owner's existing life insurance policy to a third party for more than its cash surrender value, but less than its net death benefit. Such a sale provides the policy owner with a lump sum. The third party becomes the new owner of the policy, pays the monthly premiums, and receives the full benefit of the policy when the insured dies.
47	Private Securities - Securities that are not registered; not listed on an exchange; and otherwise not publicly available for trade.
48	Non-Broker-Dealer Affiliate Product - Such as banking and insurance instruments or services related to non-broker-dealer affiliate activity and not otherwise characterized by another Product Code.
49	Exchange-Traded Notes (ETNs) - Senior, unsecured, unsubordinated debt security issued by an underwriting bank designed to provide investors access to the returns of various market benchmarks. ETNs do not actually own anything they are tracking. The note is backed by the credit of the underwriting bank that is promising to pay the amount reflected in the index, minus fees upon maturity.

** These account types are to be used when the allegations relate specifically to the type of account and not to an underlying security within the account.

Problem Codes

Select the most egregious in the complaint from the following codes.

Code	Description of Problem	(Effective 7/18/2020)**
00	Miscellaneous (Sales Practice Only) - "Sales Practice" only ("Non-Sales Practice" Miscellaneous code is "99").	
01	Misrepresentation - Allegations concerning false or misleading statements, claims, comparisons or omissions of material fact. Includes, but is not limited to, assurances and guarantees that are part of either oral or written communications or correspondence from an associated person to a customer, municipal advisory client, or prospect (not research/trading/investment banker/issuer/sponsor material).	
02	Unauthorized Trading - Allegations concerning one or more transactions that were effected without the customer's specific knowledge and approval. (Note: Not margin liquidation or dividend reinvestment type problems.)	
03	Excessive Trading - Allegations concerning trading that was controlled by the firm or Registered Representative ("RR") and was excessive given the size, frequency, and character of the account in which	

	trading was done solely to generate commissions or other compensation with disregard to the customer's investment objectives.
04	<p>Suitability - Allegations concerning an unsuitable recommended transaction or investment strategy involving a security or securities, including possible violations of, among others, the following main suitability obligations: reasonable-basis suitability (must perform reasonable diligence to understand the nature of the recommended security or investment strategy involving a security or securities, as well as the potential risks and rewards, and determine whether the recommendation is suitable for at least some investors based on that understanding); customer-specific suitability (must have a reasonable basis to believe that a recommendation of a security or investment strategy involving a security or securities is suitable for the particular customer based on the customer's investment profile); and quantitative suitability (must have a reasonable basis to believe that a series of recommended securities transactions are not excessive where there is control over the account).</p> <p>For allegations concerning activity that occurred after the Regulation Best Interest (Reg BI) compliance date of June 30, 2020, firms should consider whether to use Problem Code 16–Reg BI, even if the allegations contain suitability terminology.</p>
05	Failure to Follow Instructions - Allegations concerning the RR's or the municipal advisor's associated person's failure to follow specific instructions from the customer or the customer's proper power of attorney holder or authorized parties of corporate or other entity accounts.
06	Documentation - Allegations concerning material inaccuracies, omissions, or failures to obtain or provide required documents.
07	Solicitation - Allegations concerning improper solicitation of an account or a transaction.
08	Misappropriation/Forgery - Allegations concerning theft or misappropriation of funds or securities or forgery. (Note: Not dividend reinvestment, customer checking/debit card activity or routine transfer instructions problems.)
09	Communication with Public - Allegations concerning false or misleading statements, claims, comparisons, or material omissions in communications or correspondence to a customer or prospect (including flyers, retail communications, sales materials and advertisements prepared by an associated person).
10	Disclosure of Fees - Allegations concerning the RR's or municipal advisor's associated person's failure to advise, or incorrect information, regarding back-end fees associated with the product or disclosure of municipal advisory fees. (Includes Contingent Deferred Sales Charges (CDSC), surrender penalties, but not commissions or managed account fees.)
11	Failure to Supervise - Allegations where a customer makes a sales practice complaint against his or her RR or a municipal advisor's associated person, and also cites a failure to supervise on the part of the named supervisor, such as the branch office manager, at the time the activity occurred.
12	Poor Recommendation/Poor Advice - Allegations that a recommendation to purchase, sell or exchange a security constituted poor advice.
13	Selling Away - Allegations concerning an associated person engaging in a securities transaction outside the scope of his or her relationship with the firm and without the knowledge or approval of the firm.
14	Outside Business Activities - Allegations concerning the RR engaging in an undisclosed business activity (other than a securities transaction) outside the scope of his or her relationship with the firm (e.g., employment with another entity without the knowledge of the firm).
15	Municipal Advisor Conflict of Interest - Allegations that relate to a conflict of interest in a Municipal Advisory role, including a breach of fiduciary duty, a duty of care, or a duty of loyalty.
16	Reg BI - Allegations concerning possible violations of SEC Regulation Best Interest. This code encompasses allegations that recommendations of securities or investment strategies involving securities, including recommendations of account type, made to retail customers were not in the best interest of the retail customer. This would cover allegations of possible violations of Reg BI's four component obligations: (1) Care – including (a) reasonable-basis (must perform reasonable diligence to understand the potential risks, rewards, and costs of a recommendation, and have a reasonable basis to believe that it could be in the best interest of at least some retail customers), (b) customer-specific (must have a reasonable basis to believe that a recommendation is in the best interest of a particular retail customer based on that customer's investment profile and the potential risks, rewards, and costs of the recommendation and does not place the interests of the broker-dealer or associated person ahead of those of the retail customer), and (c) quantitative (must have a reasonable basis to believe that a series of recommended securities transactions even if in the

	retail customer's best interest when viewed in isolation, is not excessive and is in the retail customer's best interest when taken together in light of the retail customer's investment profile and does not place the interests of the broker-dealer or associated person ahead of those of the retail customer); (2) Disclosure – allegations concerning Reg BI disclosures (e.g., disclosures were not made at or prior to the recommendation or were made but were inadequate or misleading); (3) Conflict of Interest – allegations that the firm or associated person has material conflicts that were not addressed in accordance with Reg BI; and (4) Compliance – allegations concerning a member's written policies and procedures relating to Reg BI.
17	Form CRS - Allegations concerning the firm's Form CRS or issues regarding delivery of Form CRS to retail investors.
20	Research - Allegations concerning a transaction(s) that was made based upon a firm's research opinion that allegedly contained a material misstatement(s) or the omission of a material fact(s) communicated to the RR, customer or municipal advisory client. (This will usually be coded as a "Firm" (rather than an "RR") problem.)
21	Product Origination/Investment Banking - Allegations concerning a transaction(s) that was based on disclosures(s) (e.g., investment banking/issuer/sponsor/obligated person) that allegedly lacked "due diligence" in that such disclosure(s) contained a material misstatement(s) or the omission of a material fact(s) communicated to the RR/customer. (This will usually be coded as a "Firm" (rather than an "RR") problem.)
22	Trading - Allegations concerning a transaction(s) that was based on a Trading Department (or support staff) disclosure(s) that contained a material misstatement(s) or the omission of a material fact(s) relating to secondary market conditions or security feature communicated to the RR/customer. (This will usually be coded as a "Firm" (rather than an "RR") problem.)
23	Poor Performance - Allegations concerning the poor performance of the customer's account, but do not allege any specific sales practice violations against the RR or attribute damages to a research analyst recommendation. (Not otherwise reportable under Sales Practice Codes 20, 21 or 22.)
24	Managed Accounts - Allegations concerning the practice of an in-house or outside money manager. (Not to be used when the RR is the money manager and allegations are of a sales practice nature against the RR.)
25	Marketing/Sales Literature - Allegations concerning false or misleading statements, claims, comparisons or material omissions found in <i>retail communications</i> , advertisements, sales literature and other written firm communications. (Not research trading/investment banking/issuer/sponsor materials.)
26	Regulation B - Allegations concerning a denial of credit on the basis of race, color, religion, national origin, sex, marital status, age, receipt of income from public assistance programs or good faith exercise of any rights under the Consumer Credit Protection Act (CCPA). (Usually coded as a "Firm" (rather than an "RR") problem.)
27	Regulation E - Allegations concerning a failure by the firm to comply with Regulation E – the Electronic Transfer Act. (Usually coded as a "Firm" (rather than an "RR") problem.)
28	Regulation S-P - Allegations concerning a failure by the firm to comply with Regulation S-P, which was adopted to implement Title V of the Gramm-Leach-Bliley Act. Pursuant to Regulation S-P, a financial institution must: <ul style="list-style-type: none"> ▪ Disclose to customers - on an initial and annual basis - its policies for collecting and sharing a customer's non-public personal information with affiliated and non-affiliated third parties; ▪ Provide the firm's customers with the ability to "opt out" of certain disclosures of their non-public personal information to non-affiliated third parties, with certain exceptions; ▪ State the financial institution's security standards to protect a customer's nonpublic personal information. (Usually coded as a "Firm" (rather than an "RR") problem.)
29	Third Party/Anonymous - Allegations received by an unauthorized third party or anonymous source. (Note: If the firm received authorization from the customer subsequent to the receipt of a third party/anonymous complaint, it is obligated to file an amendment via the Firm Gateway application within 45 days of receipt of the authorization to identify the true problem code.)
30	Complaints Referred to Previous Employer - Allegations received by a firm against a current or previously employed associated person regarding activities that occurred at the associated person's former employer firm.
31	Other Theft/Forgery - Allegations concerning theft or misappropriation of funds or securities or forgery against someone other than an associated person of the firm.
32	Identity Theft - Allegations concerning improper use of a customer's social security number or other non-public personal identity information by unauthorized individuals or entities.

33	Affiliate Activity (Non-Broker-Dealer or Non-Municipal Advisor) – Allegations concerning activity at an affiliate not otherwise characterized by another problem code.
40	Miscellaneous - Firm related complaints only. Non-sales practice miscellaneous code is 99. Sales practice miscellaneous code is 00.
Non-Sales Practice Problem Codes	
50	Transfer of Accounts - Allegations concerning full or partial transfer of a customer's account between broker-dealers. Includes both ACATS and manual transfers and internal transfers between branches.
51	Receipt or Delivery of Securities - Allegations concerning receipt or delivery of any type of security from broker-dealer to a customer or vice versa. Includes lost certificates, delayed securities transfers, non-transferable securities or securities not in transfer because of a fail.
52	Receipt or Disbursement of Funds - Allegations concerning funds received from or disbursed to a customer. Includes checks generated automatically, such as monthly dividend checks, IRS distribution, etc.
53	Dividend and Interest Problems - Allegations concerning payments or charges of dividends or interest, including stock dividends. Does not include disbursement of automatic monthly dividend checks or margin interest dependencies.
54	Margin Problems - Allegations concerning margin, including account liquidations, margin call notification and margin interest discrepancies.
55	Reorganization/Redemption - Allegations concerning stock splits, tenders, mergers, bond/unit trust redemption and called bonds.
56	Proxy/Prospectus - Allegations by a customer concerning the delay or non-receipt of any of the foregoing, including an Official Statement prepared by or on behalf of a state or local government in connection with a new issue of municipal securities and shareholder mailings.
57	Execution - Allegations concerning non-execution, price discrepancy, delay in entry or report and delay in mutual fund purchases and redemptions.
58	Statement/Confirms - Allegations concerning physical characteristics and representation of statements/confirmations, failure to receive statement/confirmations and questions regarding the reported price or value of, or failure to value, a security.
59	Tax Reporting - Allegations concerning tax reporting to, or on behalf of, a customer. Includes 1099, TEFRA withholding, K-1, W2-p, 5498 and Year-to-Date information appearing on monthly statements as well as any other tax reporting forms.
60	Fees and Commissions - Allegations concerning customary fees (custodial, administrative), service charges (bounced checks, lost certificate, replacement, etc.) and commissions/markups (markdowns) and wrap fees or fees for municipal advisory services.
61	Account Administration and Processing - Allegations concerning daily activity in a customer's account (e.g., trade corrections, journal entries, un-invested credit balances, and erroneous or missing positions in account).
62	On-Line Trading - Allegations concerning trading initiated by a client on-line (including non-execution, price discrepancy, delays in execution and delays in trade confirmation).
63	Service Issues - Allegations concerning inadequate or unsatisfactory service from the firm or any of its employees.
64	PATRIOT Act Liquidation - Allegations concerning the liquidation of an account due to the firm's inability to confirm the customer's identity as per Section 326 of the PATRIOT Act or failure to obtain foreign bank certifications per Sections 313 and 319(b) of the PATRIOT Act.
65	Account Administration and Processing — Account Opening - Allegations concerning problems establishing a new account (e.g., delays in opening account, and issues with account type and documentation).
66	Account Administration and Processing — Account Maintenance - Allegations concerning non-transaction-related problems with existing accounts (e.g., address changes, investment objective changes, title changes and account closing issues).
67	On-Line Issues - Allegations concerning access and functionality of a firm's online system (connectivity and navigation).
68	Firm Policy - Allegations concerning a customer's dissatisfaction with a firm policy or procedure (that is not otherwise better characterized by another Problem Code).
99	Miscellaneous (Non-Sales Practice Only) – “Non-Sales Practice” only (“Sales Practice” Miscellaneous code is “00”).

** Problem Codes 16 and 17 are available on 7/18/2020.