

Transactions of FINRA or AMEX employees

Overview:

If an employee of FINRA or the American Stock Exchange (“AMEX”) wishes to open an account, or have a financial interest or trading control in an account with <Name of Firm>., the following procedures will be followed.

Responsibilities:

Registered Representative:

- ❖ Inform the designated Principal of the potential customer’s affiliation.
- ❖ Do not directly or indirectly give anything of more than nominal value to any FINRA or AMEX employee who has responsibility for a regulatory matter that involves <Name of Firm>..
- ❖ Do not directly or indirectly make any loan of money or securities to any FINRA or AMEX employee.

Supervision:

- ❖ The designated Principal will:
 - Obtain written instruction from the employee to provide copies of account statement to FINRA
 - Provide offering documents to the employee upon receipt of written employer instruction from the employee.
- ❖ Evidence of the designated Principal’s approval will be evidenced by the existence of the request for approval and the approval in the customer file.
- ❖ The designated Principal will not allow to be directly or indirectly given anything of more than nominal value to any FINRA or AMEX employee who has responsibility for a regulatory matter that involves <Name of Firm>..
- ❖ The designated Principal will not allow to be directly or indirectly made any loan of money or securities to any FINRA or AMEX employee.

Documentation:

Location	Retention
❖ Customer File	❖ 6 years after the account is closed

Related Rules:

FINRA Rule 2070