Surveillance Policies

Policy	Definition
Corrupt Practices	
Bribery	Detect an employee offering, giving, receiving, or soliciting an item of value to influence an action of a key decision maker.
Coercion and Intimidation	Detect persuasion through force or threats.
Extortion	Detect when someone is forced to feel indebted against their will and is offered "protection" in exchange for money or favors.
Embezzlement	Detect an attempt to engage in converting assets, entrusted to them via a financial institution or similar business function, for their own personal gain.
Guarantees and Assurances	Detect a registered representative providing a guarantee against loss to a customer.
Foreign Corrupt Practices Detection (FCPA)	Detect corruption and bribery with foreign officials and an attempt to keep from being discovered, in line with the United States Foreign Corrupt Practices Act (FCPA).
Money Laundering	Detect the concealment of illegally obtained money by targeting specially designated nationals, block lists, and high-risk regions.
Political Solicitations	Detect contributions to political causes that are offered or solicited, which may be against firm or regulatory rules and pose a conflict of interest.
Unfair and Unbalanced Trade	Detect broker-dealers misleading customers or not complying with advertising rules of Financial Industry Regulatory Authority (FINRA) and the U.S. Securities and Exchange Commission (SEC).
Inside Information	
General Tipping	Detect the sharing of potential material nonpublic information (MNPI) regarding general company information, financial information, or corporate actions.
Rumors and Speculation	Detect the distribution or discussion of unverified and doubtfully true information.
Collusion	
Change of Venue	Detect an attempt to avoid discovery by changing the communication venue (i.e., moving from email to phone call).
Collaborative Discussions	Detect employees working together to prevent the discovery of misconduct.

Pharmaceuticals Sales Fraud

Kickbacks	Detect pharmaceutical sales representatives paying "remuneration" to induce or reward patient referrals or the generation of business involving any item or service payable by federal health care programs.
Off-Label Selling	Detect pharmaceutical sales representatives attempting to influence physician's decisions to prescribe medications for a condition different from their intended or approved use.

Use of Personally Identifiable Information (PII)

Credit Card Information	Detect the sharing of credit card information.
Social Security Number or Equivalent Identification	Detect the sharing of United States passport, social security, drivers license and individual taxpayer identification numbers.

Market Manipulation

Boasting (Market Content)	Detect the excessively proud and self-satisfied talk by a trader of their achievements in regard to someone less fortunate.
Front Running	Detect traders attempting to buy or sell financial products ahead of other orders to lock in a better price.
Layering	Detect traders placing and then cancelling orders that they never intended to execute, with the intention of influencing the price.
Mirror Trading	Detect simultaneous buy and sell trades of the same stock on different exchanges by the same entity, as a way to move money between jurisdictions.
Pre-Arranged Trading	Detect traders agreeing on trade price in advance of execution.
Price and Benchmark Fixing	Detect agreements between traders to collectively manipulate the price of a financial product or a benchmark to adjust market conditions.
Pump and Dump	Detect traders attempting to boost the price of a financial product after establishing a large long position by sharing false or misleading information.
Short and Distort	Detect traders attempting to decrease the price of a financial product after establishing a large short position by sharing false or misleading information.
Forex Fix Rigging	Detect agreements between traders to collectively manipulate benchmark foreign exchange rates (FIX) to artificial levels.

Anti-Trust Violations

Price-Gouging	Detect raising the prices of goods to unreasonable levels to take advantage of demand or supply shock.

Code of Conduct Breaches

Hate and Discrimination	Detect inappropriate treatment of others based on race, color, religion, sex, national origin, age, disability or genetic information.
Influencing a Regulator	Detect someone attempting to have an effect on a regulator's actions or decisions.
Influencing Compliance Team	Detect someone attempting to have an effect on a compliance team member's actions or decisions.
Sexually Explicit Language	Detect sexually explicit language commonly used during sexual harassment.

Gifts and Entertainment	
Excessive Entertainment	Detect entertainment that breaches the gifts and entertainment company policy.
Excessive Gifts	Detect gifts that breach the gifts and entertainment company policy.
Sporting and Events	Detect expensed sporting events and other events that breach the gifts and entertainment company policy.
Customer Complaints - Financial	
Errors	Detect customer complaints about errors causing customer dissatisfaction.
General	Detect customer complaints about a service or product sold via retail channels causing customer dissatisfaction.
Suitability	Detect customer complaints about recommendations that were made to them that they believe were knowingly unsuitable.
Unauthorized	Detect customer complaints about a group or individual who performed or completed a task or operation that was not authorized.
Institutional Customer Complaints - Financial	
Allocation	Detect complaints from institutional clients regarding misallocation of funds.
Dissatisfaction	Detect general dissatisfaction complaints from institutional customers.
Illegal Behavior	Detect accusations of illegal behavior from institutional customers.