PROTEGENT PTA
Automated compliance for personal trading regulations
WHAT IS PROTEGENT PTA?

SunGard’s Protegent PTA is a browser-based application that automates compliance with personal trading regulations covering the full spectrum of regulatory agencies, self-regulating organizations, and a firm’s specific code of ethics and policies. Protegent PTA provides a centralized location to streamline all aspects of employee facing compliance for financial services organizations including Investment Advisors, Mutual Funds, Broker-Dealers, Ratings Agencies, Insurance Companies, Hedge Funds, Investment Banks and Private Equity Companies.

› Automated loading of employee brokerage account data – confirms, positions and securities
› Employee pre-clearance and confirmed trade capture
› Trade monitoring and analysis
› Certifications for holdings, broker accounts, transactions, code of ethics and custom certifications for firm specific needs
› Comprehensive reporting
› Personalized dashboard including posting of company news, information, documents and contacts
› Quick access from the dashboard to daily events and transactions that require compliance attention
› Online violation review, including maintaining comments and recording recommended actions
› Automated email alerts, such as certification reminders
› Auditable email notifications can be sent from compliance to access persons
› Scalable solution using advanced, proven technology (J2EE, JBOSS, SQL Server)
› Integration with firm trade and order management systems, security masters and HR systems
› Flexible, customizable rules validation engine
› Ability to associate access persons with multiple groups of reporting and rule assignment purposes
› Custom query results and reports can be exported to Microsoft® Excel or Adobe PDF formats

BENEFITS OF PTA

Designed specifically to allow compliance a central location to monitor and manage employee trading activity, Protegent PTA helps ensure compliance with regulatory requirements and individual firm mandates.

› Comprehensive surveillance and alerts to help avoid regulatory fines
› Reduced compliance paperwork
› Streamlined workflow
› Improved visibility into employee personal trading
Protegent PTA provides a centralized location to streamline all aspects of employee facing compliance for financial services organizations.

**Personalized Dashboard**

Customers can configure the Protegent PTA dashboard to incorporate unique aspects of their employee monitoring program. Documents, contacts and news and information relevant to the policy and procedures of their employee monitoring program can be dispensed via the application dashboard.

Users can configure which items of interest, or items that require action, via the Daily Summary section for each specific role within the application.

Compliance users have additional capabilities including the Compliance Calendar and presentation of user defined Query Builder results.

The Compliance Calendar allows for tracking of any tasks relevant to employee monitoring and provides an easy to manage calendar view of any upcoming tasks and/or events. Query Builder enables compliance users to define what is critical to know and present these results directly on the dashboard effectively reducing the need to manually initiate repetitive research.

**Real-Time Preclearance Requests**

Each time a user wishes to make a personal trade, a request is entered into the system and tested against multiple “rules” including regulatory mandates, code of ethics policies and/or standard trading practices. Compliance officers may choose to have completely automated preclearance processing, a manual approvals process, or a mix of both based on certain trade parameters. The simplified entry screen helps enable employees to quickly submit preclearance requests.
Automated Analysis of Executed Employee Trades

Employee executed trades can be automatically analyzed for any potential violations. Analysis of executed trades ensures employees are indeed properly requesting preclearance approval of all trades. Several "rules" exist which identify potential issues relative to employee trading activity. Violations are reported to Compliance and allow the ability for complete review, audit trail of action taken, and documentation of process.

Protegent PTA Rules

Rules provide firms with the highest degree of transaction control to help ensure personal trading compliance. System's administrative interface provides complete control over an extremely powerful rules validation engine, helping enable granular definition of rules and rule arguments against which personal trading transactions are tested. The rules engine helps enable firms to quickly update rules and apply them to any or all user levels, including access persons, access groups, access levels, and/or corporate entities, as well as to create custom, firm-specific rules. Rules include:

- **Blackout Period**
  Prohibits access persons from trading securities which have been bought or sold.

- **De Minimus**
  Allows for pre- and post-trade clearance on trades that are less than a certain number of shares or dollar amount.

- **Open Orders**
  Prohibits access persons from trading securities for which the firm currently has a pending order.

- **Preclearance**
  Requires an access person to obtain permission before making a personal trade by entering an online preclearance trade request.

- **Restricted Security Lists**
  Prohibits access persons from trading either specific security types or individual securities.

- **Short-Swings**
  Flags any access person who has made either a purchase and sale or sale and purchase of the same security during a specified period.

- **Short-Swing Profits**
  Notifies compliance of an access person who has profited from either a purchase and sale or sale and purchase of the same security during a specified period of time.

- **Short Selling**
  Identifies when employees are engaging in short selling activities. The check can be limited to include only certain securities.

- **Excessive Trading Rules**
  Several Excessive Trading Rules can be used by compliance to monitor the frequency of access persons’ trading activity. Dollar value, number of shares and total quantity can be monitored.

- **Confirmation and Holdings Analysis**
  Analyze the executed trade against the employees’ holdings to identify patterns that may require additional scrutiny. Analysis can be performed against only the account where the trade was executed or across all the employees’ accounts.

- **Configurability**
  Over 100 configurable rules delivered with the application.

The Rules Reference Guide encompassing the full rule library is available upon request. The guide provides a detailed explanation for each Protegent PTA rule.
Reporting Capabilities

Protegent PTA provides users with activity reports. Standard reports, such as Quarterly Transactions and Front-Running are available, as well as advanced transaction searches and queries that allow for custom reporting capabilities. Many reports can be sent automatically to a compliance email box. The export feature helps enable firms to export all System data and reports into either .PDF or Excel (.csv) format. Reports include:

- Front-running report
- In and out trading report
- Certifications report
- Trade volume report
- Broker confirm validation report
- Preclearance validation report

The Reports Reference Guide encompassing the full report library is available upon request. The guide provides a detailed explanation for each available report.

Built-In Query Builder Tool

The Advanced Search Tool is a data retrieval tool for the creation of custom queries. The tool is extremely useful when responding to unique, ad-hoc requests. The impetus for these requests could be from one of the following:

- Forensic analysis
- Internal or external audit response
- Management requests

The custom query can also be saved and used as a canned query for situations where the same information needs to be retrieved on a periodic basis. These custom queries can be easily shared by placing them in a shared directory. The custom queries can also be made private. Additionally, the results of any custom query can be automatically presented on the compliance dashboard. Like most Protegent PTA screens and all reports, the results from the custom query are exportable to Microsoft® Excel or Adobe PDF formats.
Standard and Custom Certifications

Protegent PTA provides several standard certifications including Certificate of Accounts, Certificate of Holdings, Certificate of Compliance, and Certificate of Transactions, and the ability to create Custom Certifications. Custom certifications are a means to dispense any mandatory attestations required of employees such as the following:

- Outside business activities
- Gifts and entertainment
- Political contributions
- New employee forms
- Directorship requests
- Insider information
- Employee voting

The ability to dispense questionnaires as part of a certification increases the firm’s ability to gather and manage information required of employees. Responses to questionnaires can also be automatically analyzed to determine if any responses require additional scrutiny.

Custom Disclosures

Protegent PTA provides the ability to create Custom Disclosures, which allow employees the ability to voluntarily submit required information. Similar to questionnaires dispensed through certifications, disclosure responses can also be automatically analyzed to determine if any responses require additional scrutiny.

Extended Case Management

In some instances, infractions are not based on a single event and the need to manage cases based on a series of events is needed. Protegent PTA enables firms to relate several events and manage as a single, comprehensive case. Supporting documentation can be attached to cases and allows Protegent PTA to be the complete source of information related to a given case.
### Control Room

The new Control Room module is the natural extension of PTA’s forensic capabilities and has been designed to go above and beyond basic code enforcement to provide a holistic view of internal employee and firm activity. This is accomplished by identifying patterns of internal activity, combined with risk ranking and a comparison of market news, corporate actions and price/volume fluctuations. This module also allows for review and detection of potential conflicts through firm-wide business intersection reporting.

- Alerts (rules) - Configurable
- Dashboard (Control Room specific)
- Security Research
- Conflicts Detection
- Market Data Feeds (News, Corporate Actions, Price and Volume)

### Document Handling

Many companies typically track evidence in a file cabinet and associating documents to the employee monitoring system is cumbersome at best. Protegent PTA can be a repository of documents related to employee monitoring. Softcopy documents can be attached to a number of different types of records within the system. Typical documents tracked include but not limited to:

- Discretionary account agreements
- Private transactions
- Trade confirmations
- Proof of account closure

### Automated Delivery of Employee Account Information

Protegent PTA can process confirmation files, accounts and positions electronically. The system has an XML configurable data load capability to load data feeds from any broker-dealer offering the service. Brokerage data can also be entered manually through an online screen or bulk loading via a .CSV file.

SunGard has fostered technical relationships with broker-dealers to provide employee trade confirmations and statements electronically. Additionally, SunGard is continually expanding these relationships and offering new service to existing customers at no additional charge. Availability is contingent upon an agreement between the customer and the broker-dealer. SunGard has also entered into a relationship with a data aggregation service to expand the capabilities of electronic feeds beyond the traditionally available broker feeds. Please contact your SunGard Protegent representative for more information.

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**Adjustment Entry Detail**

[Adjustment Entry Detail Image]
**System Language Configurations**

Protegent PTA is now available for deployment in 12 different languages. English, French Canadian, French, German, Italian, Spanish, Swedish, Dutch, Chinese (Simplified), Chinese (Traditional), Korean and Japanese. Localization can be configured by each employee to specify language and date format preferences. This functionality allows for a simplified deployment of Protegent PTA to geographically disperse regions that have restrictions on local language application support.

**Implementation and Support**

Protegent PTA is available as a SunGard hosted ASP solution or client-installed solution. The ASP solution provides customers with the ability to offload the burden of application and system support. The customer-installed solution affords customers the same benefits of the ASP solution as well as the ability to manage their own data. With the ASP solution, deployment is performed by experienced staff using proven implementation methodologies with relatively minimal effort required of customers.

Both versions share the same advantage of dedicated Protegent PTA support, which allows customers to quickly interact with support staff and avoid long response times.

Protegent PTA spans all areas of personal trading from pre-clearance authorization through post-trade reconciliation and reporting.

**Training**

The Protegent PTA team equips customers with the tools needed to have users up and running quickly. Designated training plans, partnered with personal facilitation by Protegent PTA trainers, educate users of workflows inherent with their particular roles within the application. These plans also allow firms to easily administer training themselves via the “Train-the-trainer” program.
PROTEGENT’S SUITE OF COMPLIANCE SOLUTIONS

Drawing from over a decade of intellectual capital, Protegent has maintained its commitment to protecting insurance, retail brokerages and other buy- and sell-side financial services from the mounting requirements mandated by regulatory bodies, such as, FINRA, SEC, and NAIC. More than ever before, firms need an efficient enterprise-wide surveillance tool to transform the challenges of increasing costs and compliance into a combined solution.

As an intuitive automated system designed to detect, prevent and document potential regulatory violations, Protegent PTA is the premier solution provider for monitoring firms’ employee personal trading against regulatory and firm defined guidelines.

In addition to the risk mitigation provided by Protegent PTA, SunGard’s Protegent offers an integrated paperless solution for trade surveillance, data archiving and reporting, and managing disparate systems. The combined suite of Protegent solutions can further help firms streamline efforts and embed a culture of compliance. Financial services aggressively seeking to control cost, while meeting the demands of regulators and corporate governance mandates, can turn to SunGard Protegent because more than a vendor – it is a trusted partner that can help your firm further mitigate risk and maximize value.

**Protegent Trading Compliance**

A Web-based surveillance, supervision and management reporting tool that automates the institutional compliance workflow, and:

- Provides firms with a complete view of an order’s life cycle
- Captures and integrates data feeds from both market and trade data
- Provides a consolidated view of orders and executions
- Allows customers to meet Reg NMS, OATS and various supervisory requirements

**Protegent Surveillance**

As a rules-based and an integrated solution provider, Protegent Surveillance offers the tools necessary to mitigate internal and regulatory risk by:

- Automating the entire compliance process, including suitability review, exception reporting, regulatory and internal auditing, and workflow case management
- Identifying questionable transactions and position
- Improving field supervision processes and audits
- Analyzing customer and account activity against firm defined mandates

**Protegent Customer Onboard**

More than a data entry form, Protegent Customer Onboard is a process to manage the end-to-end customer relationship through its wizard based system for client data entry and processing. This automated system:

- Facilitates the opening of new brokerage and non-brokerage accounts across multiple back-office applications
- Available as a stand-alone solution or as an integrated component of Protegent Surveillance
- Helps ensure compliance with FINRA regulations, such as KYC, Rule 2821, OFAC, CIP and AML

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SUNGARD

SunGard is one of the world’s leading software and technology services companies, with annual revenue of about $2.8 billion. SunGard provides software and processing solutions for financial services, education and the public sector. SunGard serves approximately 16,000 customers in more than 70 countries and has more than 13,000 employees. For more information, please visit www.sungard.com.

ABOUT SUNGARD’S TRADING SOLUTIONS

About SunGard’s Protegent SunGard’s Protegent is a suite of solutions that help automate financial institutions’ compliance processes. It helps give financial institutions transparency into their data while helping them to enforce and document their compliance policies and procedures. Protegent’s solutions cover social media review, personal trading oversight, market abuse, Reg NMS, Order Audit Trail System (OATS), and transaction supervision and surveillance review.

For more information, please visit www.sungard.com/protegent.

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