

- b) East Coast Business Manager - Armen Brash
- c) Investment Advisory - Mary Keaveney
- d) Fixed Income - Ron Colonna, James (Jim) Donofrio

**High Risk Media Policy**

**Below attached is the High Risk Media Policy for Financial and Non-Financial Transactions**  
**Splitting Transaction**

- Transaction approvers must ensure that an instruction is not being split to avoid a control or policy requirement.
- Prior to approving a transaction, TAG must check if any other transactions have been processed out of the same account that day.
- If multiple transactions are located, then TAG must review the amount to see if they total more than \$50K or more than \$500MM. If not, then they can proceed with the usual process.
- If the aggregate transactions exceeds \$50K but is less than \$500MM and being processed based on Verbal Instructions, without written authorization or a call back, then, TAG must check to see if the recipient of the funds is the same.
- If the recipient is the same, then TAG must reject the transaction for Written Authorization from the client PLUS evidence of the call back.
- If the recipient is NOT the same, then the transaction can be processed per the usual procedures.
- If the aggregate transactions exceeds \$500MM, then, TAG must check to see if the recipient of the funds is the same.
- If the recipient is the same, then TAG must reject the transaction for the "Bear Trap" control (MD Release Approval Template).
- If the recipient is NOT the same, then the transaction can be processed per the usual procedures.

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