

Records Management/Handling of Broker Dealer Records

During your engagement with Prudential, you are responsible for maintaining, preserving, protecting, and disposing of Prudential's business records in a manner that complies with applicable laws, regulations, Prudential requirements that are communicated to you, and your agreement with Prudential. You must also preserve any records that you are told are subject to a Prudential Records Hold Order.

As it pertains to Prudential Broker-Dealers' records you maintain, you must 1) store and preserve the records in a manner which is in accordance with the federal securities record keeping laws, MSRB rules, Financial Industry Regulatory Authority ("FINRA") rules and all other applicable laws, rules and regulations (collectively, the "recordkeeping rules"), which are applicable to Prudential Broker-Dealers, (2) keep the records in an organized manner as required by such recordkeeping rules, 3) timely update the records to keep and ensure that they are current as required by recordkeeping rules and 4) provide prompt access to Prudential Broker-Dealers' records to either the Securities and Exchange Commission ("SEC") or FINRA if either requests Prudential Broker-Dealers' records that you maintain.

Furthermore, if you are informed by Prudential that it is required to submit an updated, revised, amended or new Undertakings filing, as defined by Rule 17a-4 of the 1934 Securities and Exchange Act, you will promptly provide individual Undertakings filings' letters (if requested) in a timely fashion and manner, which will allow Prudential Broker-Dealers to meet each firm's regulatory obligations under recordkeeping rules.