Brokerage and Wealth Management Services (WMS) NIGOs

Reference Guide

Table of Contents

Overview

This reference sheet provides Brokerage and WMS Not in Good Order (NIGO) best practices and includes information related to:

- NIGO communications
- Potential NIGO reasons
- Explanation of NIGO reasons
- Resolution methods

Note: For more detailed information about locating, filling out, and uploading the forms mentioned throughout this reference guide, please consult the Forms Library Overview Reference Sheet.

Brokerage and Wealth Management Services (WMS) NIGOs

Processes and Requirements

NIGO Communication for Brokerage

The status of Brokerage and WMS submissions, including NIGOs, can be viewed in the **Cases** Tab within Practice360°. Upon MMLIS Home Office receipt of the new business paperwork, a case(s) will be created within the Advisor360° platform. Cases provide the home office processing status of the submitted application and note if additional information is needed.

All brokerage NIGOs will be communicated via the Cases tab. Cases with NIGOs will be listed as "Follow Up Required," and the Registered Representative of record listed on the account documentation will receive a notification when the status of an item is changed to NIGO. In certain severe or urgent cases, the Home Office may also email or call with NIGO information.

MML Investors Services NIGO Correction Policy

For MSA-eligible business, certain changes may be made within Client360° or through other methods that do not require client initials. These are listed in the table below.

Any changes or alterations to the application that require client initials should be made by crossing out the incorrect information and inserting the correct information neatly. All such changes must be approved and initialed by the applicant; whiteout may not be used.

For more information about updating application and client information, please consult the Updating Account Suitability Information reference guide.

NIGO Time Requirements

Representatives should respond to NIGOs within 5 business days. If a NIGO is not resolved within this time, the MMLIS home office team may close the case, requiring the representative to resubmit.

Note: If there is a check accompanying a request, the NIGO must be resolved within 24 hours, or the check may be returned.

Resolving the NIGO

NIGOs may be resolved in a number of ways. The Home Office case owner can be contacted directly from the NIGO notification in the Practice360° Cases tab. For simple corrections that do not require a client's signature or a new document to be uploaded, this is the quickest way to resolve a NIGO. These corrections can also be made by uploading new or updated documentation via DocuSign the Documents tab in Practice360°.

If the client's initials are required, the updated paperwork can be submitted via DocuSign, or the other methods listed above.

Brokerage and Wealth Management Services (WMS) NIGOs

Using Client360° for MSA-Eligible Account NIGOs

For accounts that are created with a Master Services Agreement (MSA), certain changes related to account information may be made within Client360°. The methods described in the table below may also be used.

Note: When possible, all NIGO-related communication should be done within Advisor360°. Representatives should communicate with the Home Office through the Cases tab and, when needed, send updated documentation through the Documents tab in Practice360°.

NIGO REASONS AND RESOLUTION METHODS

<table>
<tr><th rowspan="2">NIGO Reason</th><th rowspan="2">Explanation</th><th colspan="2">Resolution Method</th></tr>
<tr><th>Phone</th><th>Cases Tab and Documents Tab</th></tr>
<tr><td>Missing or Incomplete Statement of Investment Selection (SIS)</td><td>In order to establish a Wealth Management Services (WMS) account, a Statement of Investment Selection (SIS) generated through Envestnet is required. Since the SIS directly reflects an electronic proposal in ENV2, handwritten amendments are not allowed. Any changes will require a new proposal to be drafted in ENV2 and signed by the client.</td><td>Not Applicable</td><td>Can be resolved without client initials:
• Registered Representative Signature
Client initials and date required:
• Missing Client Signature
• Client Signature Dates</td></tr>
</table>

Brokerage and Wealth Management Services (WMS) NIGOs

NIGO Reason	Explanation	Resolution Method	
		Phone	Cases Tab and Documents Tab
Missing or Incomplete Addendum for Managed Accounts	MMLIS requires this addendum when opening account(s) in connection with the SMA Select program on the WMS platform. Use the **Brokerage Accounts Addendum for Managed Accounts (MF1292)** form for non-retirement and **Premiere Select IRA Addendum for Managed Accounts (1.829625)** for retirement accounts.	Not Applicable	**Can be resolved without client initials:** • Address (a P.O. Box is not acceptable for a legal address) • Registered Representative Signature **Client initials and date required:** • Missing Client Name • Missing SSN/ TIN • Missing Client Signature • Client Signature Dates
Missing or Incomplete Brokerage Account Application	MMLIS requires a fully completed **Brokerage Account Application (1.866616)** to process every new non-retirement account custodied by NFS	• Investment Purpose • Investment Objective • Investment Time Horizon • Address (a P.O. Box is not acceptable for a legal address) • Phone Number • Date of Birth • Citizenship • Occupation/ Employer info • FINRA Member / Senior Foreign Political Figure • US Government-Issued Photo ID information • Financial Profile • Investment Product Knowledge • Assets Held Away	**Can be resolved without client initials:** • Missing Registered Representative Signature • Registered Representative Signature Dates **Client initials and date required:** • Registration type • Missing Client Name • Missing SSN/ TIN • Missing Client Signature • Client Signature Dates • Partially Completed Trusted Contact Information o Providing trusted contact information is not required, but if any information is entered, it must be comprehensive.

Brokerage and Wealth Management Services (WMS) NIGOs

NIGO Reason	Explanation	Resolution Method	
		Phone	Cases Tab and Documents Tab
Missing or Incomplete Premiere Select IRA Application	MMLIS requires a fully completed **Premiere Select IRA Application (1.828246)** to process every new IRA account custodied by NFS.	• Investment Purpose • Investment Objective • Investment Time Horizon • Address (a P.O. Box is not acceptable for a legal address) • Phone Number • Date of Birth • Citizenship • Occupation/ Employer info • FINRA Member / Senior Foreign Political Figure • US Government Issued Photo ID information • Financial Profile • Investment Product Knowledge • Assets Held Away	**Can be resolved without client initials:** • Missing Registered Representative Signature • Registered Representative Signature Dates **Client initials and date required:** • Registration type • Missing Client Name • Missing SSN/ TIN • Missing Client Signature • Client Signature Dates • Partially Completed Trusted Contact Information o Providing trusted contact information is not required, but if any information is entered, it must be comprehensive.
Missing or Incomplete Premiere Select SIMPLE IRA Application	MMLIS requires a fully completed **Premiere Select SIMPLE IRA Application (1.828247)** to process every new SIMPLE IRA account custodied by NFS.	• Investment Purpose • Investment Objective • Investment Time Horizon • Address (a P.O. Box is not acceptable for a legal address) • Phone Number • Date of Birth • Citizenship • Occupation/ Employer info • FINRA Member / Senior Foreign Political Figure • US Government Issued Photo ID information	**Can be resolved without client initials:** • Missing SIMPLE IRA Plan Adoption Forms • Missing Registered Representative Signature • Registered Representative Signature Dates **Client initials and date required:** • Missing Client Name • Missing SSN/ TIN • Employer Tax ID # • Missing Client Signature

Brokerage and Wealth Management Services (WMS) NIGOs

NIGO Reason	Explanation	Resolution Method	
		Phone	**Cases Tab and Documents Tab**
		• Financial Profile • Investment Product Knowledge • Assets Held Away	• Client Signature Dates • Incomplete Trusted Contact Information
Missing or Incomplete Trust Documents	To establish a trust account, MMLIS requires a fully completed **Trustee Certification of Investment Powers form (1.747632)**.	• Address (a P.O. Box is not acceptable for a legal address) • Phone Number • Date of Birth • Citizenship • Occupation/ Employer info • FINRA Member / Senior Foreign Political Figure • US Government Issued Photo ID information	**Can be resolved without client initials:** • Missing Form(s) **Client initials and date required:** • Trust Name • SSN/ TIN • Missing Trustee Signature • Trustee Signature Dates
Missing or Incomplete Corporate and Unincorporated Organization	To establish a corporate or unincorporated account, MMLIS requires a fully completed **Corporate and Unincorporated Organization Form (1.764903)**.	• Address (a P.O. Box is not acceptable for a legal address) • Phone Number • Date of Birth • Citizenship • Occupation/ Employer info • FINRA Member / Senior Foreign Political Figure • US Government Issued Photo ID information	**Can be resolved without client initials:** • Missing Form(s) • Name of Certifying Individual • Organization Date • Organization State • Name of Organizational Document • Sole Officer • Authorized Individual(s) or Entity Name **Client initials and date required:** • Authorized Individual SSN/TIN • Missing signature from certifying individual • Signature Dates from certifying individual • Corporate TIN

Brokerage and Wealth Management Services (WMS) NIGOs

<table>
<tr><th rowspan="2">NIGO Reason</th><th rowspan="2">Explanation</th><th colspan="2">Resolution Method</th></tr>
<tr><th>Phone</th><th>Cases Tab and Documents Tab</th></tr>
<tr><td>Missing or Incomplete Partnership Documents</td><td>To establish a partnership account MMLIS requires a fully completed Partnership Agreement (1.809923).</td><td>Address (a P.O. Box is not acceptable for a legal address)
Phone Number
Date of Birth
Citizenship
Occupation/ Employer info
FINRA Member / Senior Foreign Political Figure
US Government Issued Photo ID information</td><td>Can be resolved without client initials:

Missing Form(s) Client initials and date required:
Signature of ALL General Partners or Authorized Partners
Signature Dates
Partnership TIN
Authorized Partners SSN</td></tr>
<tr><td>Missing or Incomplete Limited Liability Company Documents</td><td>To establish an LLC account, MMLIS requires a fully completed Limited Liability Company Agreement (1.747633).</td><td>Address (a P.O. Box is not acceptable for a legal address)
Phone Number
Date of Birth
Citizenship
Occupation/ Employer info
FINRA Member / Senior Foreign Political Figure
US Government Issued Photo ID information</td><td>Can be resolved without client initials:
Missing Form(s)
Name of Certifying Individual
State of Organization
Date of Organization
Sole Officer
Authorized Individual(s) Name
Client initials and date required:
Missing Signature of Certifying Individual
Signature Dates
LLC TIN
Authorized Individual SSN/TIN</td></tr>
</table>

Brokerage and Wealth Management Services (WMS) NIGOs

NIGO Reason	Explanation	Resolution Method	
		Phone	Cases Tab and Documents Tab
Missing Guardian /Conservatorship Documentation	To establish a guardian /conservatorship account, MMLIS requires a copy of the court appointed document dated within 90 days of receipt by MMLIS.	Not Applicable	Registered Representative will be contacted to provide supplemental documentation.
Missing or Incomplete Non-Prototype Documentation	To establish a non-prototype account, MMLIS requires a fully completed **Trustee Certification of Investment Powers (1.747632)**.	• Address (a P.O. Box is not acceptable for a legal address) • Phone Number • Date of Birth • Citizenship • Occupation/ Employer info • FINRA Member / Senior Foreign Political Figure • US Government Issued Photo ID information	**Can be resolved without client initials:** • Missing Form(s) **Client initials and date required:** • Entity Name • SSN/ TIN • Missing Authorized Individual Signature • Authorized Individual Signature Dates
Missing or Incomplete Estate Documents	To establish an estate account, MMLIS requires a copy of the letter of testamentary naming the estate dated within 90 days of receipt by MMLIS and fully completed **Affidavit of Domicile (MF1180)**.	Not Applicable	Registered Representative will be contacted to provide supplemental documentation.

Brokerage and Wealth Management Services (WMS) NIGOs

NIGO Reason	Explanation	Resolution Method	
		Phone	**Cases Tab and Documents Tab**
Missing or Incomplete POA Documentation	To establish a Power of Attorney on an account, MMLIS requires a copy of the legal Power of Attorney documentation and **Power of Attorney Affidavit (MF1206)**.	Not Applicable	Registered Representative will be contacted to provide supplemental documentation. **Client initials and date required:** • Power of Attorney Affidavit; POA Name • POA SSN • Missing POA Signature • Signature Dates
Missing or Incomplete Transfer on Death Documentation	To establish a Transfer on Death account, MMLIS requires a fully completed **Transfer on Death Registration and Beneficiary Designation form (1.747258)**.	Not Applicable	**Client initials and date required for all changes, including:** • Client Name • Client SSN • Client Date of Birth • Missing Client Signature • Signature Date • Primary or Contingent Beneficiary: o Name o Relationship o SSN/TIN o Date of Birth
Missing Signature	MMLIS requires the signature of the client on all applicable paperwork. Copies may be submitted to MMLIS. MMLIS also requires the signature of the registered representative opening a new account.	Not Applicable	**Can be resolved without client initials:** • Registered Representative signature (on or after client)

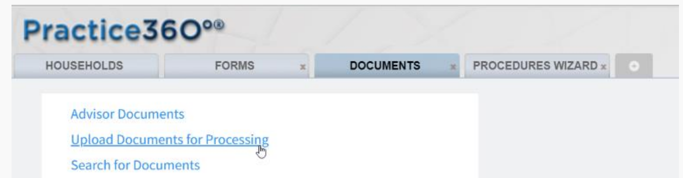
Brokerage and Wealth Management Services (WMS) NIGOs

NIGO Reason	Explanation	Resolution Method	
		Phone	Cases Tab and Documents Tab
Missing State Securities License	You must have a state securities license in every state where you conduct securities business.	Not Applicable	Once licensed, all parties (including client) are required to re-sign and date.
Missing CRIA Affiliation or Entitlements	You must have the necessary CRIA affiliations or entitlements for any submitted WMS business.	Not Applicable	Once licensed, all parties (including client) are required to re-sign and date.
Missing or Conflicting Information on Check; Unacceptable Monetary Instruments	MMLIS will not accept checks that do not contain a payee, client signature, date, amount, or discrepancy in amount (numeric vs. written amount). For information on proper check handling procedures, refer to the Acceptable and Unacceptable Forms of Payment Reference Guide in the Knowledge Center.	Not Applicable	Registered Representative will be contacted. Check will be returned to Client's Address of Record for issuance of a new check **Note:** If there is a check accompanying a request, the NIGO must be resolved within **24 hours**, or the check may be returned.

Brokerage and Wealth Management Services (WMS) NIGOs

Submission

Updates related to NIGOs can be submitted to the MML Investors Services (MMLIS) home office one of the following ways:

Documents Tab within Practice360°	1. In Practice360°, go to the **Documents** tab. 2. Then, select the **Upload Documents for Processing** link. 3. Select **Browse** to select your documents. • Documents must be in .pdf or .tif format. • To upload multiple documents, hold down the **CTRL** key while selecting multiple documents. 4. A status bar displays the progress of the document upload. Do not close the Practice360° window as the documents are uploading. 
eSignature	For details on submitting via eSignature, refer to the Advisor360° and Electronic Signatures with DocuSign resources.
Email or Mail	For current contact information, consult the MMLIS Contact List.