Money Market Fund Social Code Categorization Matrix

Document prepared by a committee of ICI members and should not be treated as legal advice. Firms should consult with counsel.



To qualify as a retail money market fund, a fund must have policies and procedures reasonably designed to limit all beneficial owners of the fund to natural persons. To assist funds in identifying accounts that qualify under this definition, an ICI industry working group has defined common practices for categorizing retail accounts identified in the matrix below using the National Securities Clearing Corporation (NSCC) listing of social code numbers and descriptions. All accounts that do not qualify under the retail definition are, by default, institutional.

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
1	Individual	Use for non-fiduciary accounts registered to an individual. Best Practice: Fund is responsible for tax reporting unless level 3 or trust networked.	Retail			No
N/A	Female	This social code was eliminated November 18, 2013. See Important Notice A7665 (posted July 3, 2013). Best Practice: Map to social code 01.	Retail			No
3	Joint tenants	Use for accounts registered to multiple individuals, including tenants in common, tenants by entirety, community property. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Retail			No
4	C corporations	Use for accounts registered to C corporations, including incorporated entities and LLCs that elect to be treated as a corporation. Excludes partnerships (social code 52) and S corporations (social code 63). Best Practice: Firm is responsible for tax reporting.	Institutional			No

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
5	Insurance companies	Use for insurance company product accounts that are fund level omnibus. Best Practice: Firm is responsible for tax reporting.	Retail/Institutional*		Money market fund may "look through" an insurance company separate account to a natural person who beneficially owns such a contract. Note: the "look through" cannot be applied to insurance company fund of funds where an investment adviser manages the fund's investment.	Yes, #21
6	Broker-dealer omnibus	Use for broker-dealer house accounts that are fund level omnibus. Best Practice: Firm is responsible for tax reporting.	Retail/Institutional*		Expect intermediary to look through to underlying shareholder(s) and make the appropriate classification of retail (natural person) versus institutional per regulation and fund prospectus.	No
7	Bank/Trust omnibus	Use for bank and trust accounts that are fund level omnibus. Best Practice: Firm is responsible for tax reporting.	Retail/Institutional*		Expect intermediary to look through to underlying shareholder(s) and make the appropriate classification of retail (natural person) versus institutional per regulation and fund prospectus. For further assistance in determining the retail/institutional categorization of a trust, please see Treatment of Ordinary Trusts Under the Retail Money Market Fund Definition.	No
8	Individual retirement account (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No
9	Individual retirement account: rollover (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No
10	KEOGH	This social code was eliminated November 18, 2013. See Important Notice A7665 (posted July 3, 2013). Best Practice: Map to either social code 34 or 50.	N/A		Not applicable because this social code has been retired. (Note: some firms may have old accounts with this code on their books and will need to determine treatment—most likely retail.)	No

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
11	Profit sharing plan (non-prototype)	Use for non-prototype profit sharing plans that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail		Note: These plans could have elements of both a defined benefit and defined contribution plan. Any accounts meeting the institutional definition (i.e., defined benefit) should be moved to either social code 53 or 93.	Yes, FAQ #16
12	401(k) plan (non-prototype)	Use for non-prototype 401(k) accounts maintained in plan level omnibus accounts. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16
13	Money purchase pension plan (non-prototype)	Use for non-prototype pension plans that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail		Money purchase plans can have elements of a defined benefit plan. Accounts meeting the institutional definition within this social code should be moved to social code 53 or 93.	Yes, FAQ #16
14	UGMA/UTMA	Use for Uniform Gifts to Minors Act and Uniform Transfer to Minor Act accounts. Best Practice: Fund is responsible for tax reporting unless level 3 or trust networked.	Retail			No
15	Trust–Retail	Use for trusts where an individual is registered as trustee for the Trust and the TIN belongs to the trustee or the Trust. Best Practice: Fund is responsible for tax reporting unless level 3 or trust networked.	Retail*		For further assistance in determining the retail/institutional categorization of a trust, please see Treatment of Ordinary Trusts Under the Retail Money Market Fund Definition. Trusts that do not qualify under the retail definition should be moved to Trust-Institutional social code 95.	No
16	Individual fiduciary	Use for nonretirement Fiduciary accounts (e.g., guardian, conservator, escrow, agent, etc.). Best Practice: Fund is responsible for tax reporting unless level 3 or trust networked.	Retail		Expect intermediary to look through to underlying shareholder(s) and make the appropriate classification of retail (natural person) versus institutional per regulation and fund prospectus.	No

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17	Individual retirement account (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
18	Broker-dealer FBO	Use for accounts registered in the firm's name under their TIN. Best Practice: Firm is responsible for tax reporting.	Retail/ Institutional*		Expect intermediary to look through to underlying shareholder(s) and make the appropriate classification of retail (natural person) versus institutional per regulation and fund prospectus.	No
19	403(b) plan (non-prototype)	Use for non-prototype 403(b) accounts maintained at the plan level and/or omnibus level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16
20	457(b) plan (non-prototype)	Use for non-prototype 457(b) plans that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail			No
21	Nonprofit organization	Use for nonprofit organization accounts. Best Practice: Fund is responsible for tax reporting unless level 3 or trust networked.	Institutional			No
22	Roth IRA (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No
23	Roth IRA (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
24	Roth Conversion IRA (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No

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25	Roth Conversion IRA (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
26	Education IRA (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No
27	Education IRA (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
28	Individual retirement account: rollover (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
29	Individual retirement account: spousal (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No
30	Individual retirement account: spousal (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
31	Simple IRA (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No
32	Simple IRA (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
33	Simplified Employee Pension (SEP-IRA) (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No

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34	Simplified Employee Pension (SEP-IRA) (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
35	SAR-SEP (fund-prototype)	Use for accounts registered under the fund's custodial IRA plan. Best Practice: Fund is responsible for tax reporting.	Retail			No
36	SAR-SEP (non-prototype)	Use for accounts not registered under the fund's custodial IRA plan. Best Practice: Firm is responsible for tax reporting.	Retail			No
37	Section 529 plan (qualified state tuition program)	Use for Section 529 plan accounts (qualified state tuition program.) Best Practice: Fund is responsible for tax reporting unless level 3.	Retail			No
38	UGMA/UTMA transferred into Section 529 plan	Use for UGMA/UTMA accounts transferred into Section 529 plan accounts. Best Practice: Fund is responsible for tax reporting unless level 3.	Retail			No
39	Section 529 plan transferred into new Section 529 plan	Use for Section 529 plan accounts transferred into new Section 529 plan accounts that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting unless level 3.	Retail			No
40	IRA transferred into Section 529 plan	Use for IRAs transferred into Section 529 plan accounts that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting unless level 3.	Retail			No

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
41	Series E/Series I U.S. saving bonds transferred into Section 529 plan	Use for Series E/Series I U.S. saving bonds transferred into Section 529 plan accounts that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting unless level 3.	Retail			No
42	Bank/Trust FBO	Use when a bank or trust company acts as custodian or trustee for an underlying shareholder or entity (nonretirement). Accounts are registered in the firm's name under their TIN. Best Practice: Firm is responsible for tax reporting. Note: In the case of money market funds, this social code is to be used for instances where a natural person matains the ability to exercise investment power including the power to redeem (e.g., revocable trust or	Retail*		Expect intermediary to look through to underlying shareholder(s) and make the appropriate classification of retail (natural person) versus institutional per regulation and fund prospectus. For further assistance in determining the retail/institutional categorization of a trust, please see Treatment of Ordinary Trusts Under the Retail Money Market Fund Definition. Trusts that do not qualify under the retail definition should be moved to Trust-Institutional social code 95.	No
		where at least one natural person is a trustee).				
43	Profit sharing plan FBO participant name/account # (fund-prototype)	Use for fund-prototype profit sharing plans that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting.	Retail			Yes, FAQ #16
44	401(k) plan FBO participant name/account # (fund-prototype)	Use for fund-prototype 401(k) plans that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting.	Retail			Yes, FAQ # 16
45	Money purchase pension plan FBO participant name/account # (fund-prototype)	Use for fund-prototype money purchase pension plans that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting.	Retail			Yes, FAQ # 16

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46	403(b) plan FBO participant name/account # (fund-prototype)	Use for fund-prototype 403(b) accounts maintained in participant FBO level accounts. Best Practice: Fund is responsible for tax reporting.	Retail			Yes, FAQ #16
47	Health savings account FBO participant name/account # (fund-prototype)	Use for fund-prototype health savings accounts that are maintained in a participant FBO level account. Best Practice: Fund is responsible for tax reporting.	Retail			No
48	Health savings account (non-prototype)	Use for non-prototype health savings accounts that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail			No
49	Single K (fund-prototype)	Use for fund-prototype single K plan accounts (i.e., a defined contribution retirement plan with one participant). Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked. (Description modified: see Important Notice A #7827 posted 04/25/2014.)	Retail			No
50	Single K (non-prototype)	Use for non-prototype single K plan accounts (i.e., a defined contribution retirement plan with one participant). Best Practice: Firm is responsible for tax reporting. (Description modified: see Important Notice A #7827 posted 04/25/2014.)	Retail			No
51	Non-qualified deferred compensation plan (non-prototype; participant directed)	Use for non-prototype, non-qualified deferred compensation plans that are maintained in a plan level omnibus account. Participants direct investments in these accounts. Best Practice: Firm is responsible for tax reporting.	Retail			No

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
52	Partnerships	Use for accounts registered to partnerships, including LLCs that elect to be treated as partnerships. Best Practice: Fund is responsible for tax reporting.	Institutional			No
53	Defined benefit plan (non-prototype)	Use for non-prototype, defined benefit plan accounts that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Institutional			No
54	Sole proprietorships	Use for business accounts registered in an individual's name. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Retail*			No
55	Governmental entities	Use for accounts registered under state or federal entities, as well as subdivisions thereof. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked. (Description modified: see Important Notice A #7827 posted 04/25/2014.)	Institutional			No
56	Real estate investment trusts	Use for REIT accounts. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Institutional			No
57	Roth 401(k) plan FBO participant name/account # (fund-prototype)	Use for fund-prototype Roth 401(k) accounts that are maintained at the participant FBO account level (fund-prototype). Best Practice: Fund is responsible for tax reporting.	Retail			Yes, FAQ #16
58	Roth 401(k) plan (non-prototype)	Use for non-prototype, Roth 401(k) accounts that are maintained at a plan omnibus level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16

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59	Roth 403(b) plan FBO participant name/account # (fund-prototype)	Use for fund-prototype Roth 403(b) accounts that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting.	Retail			Yes, FAQ #16
60	Roth 403(b) plan (non-prototype)	Use for non-prototype, Roth 403(b) accounts that are maintained at the plan omnibus level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16
61	Section 529 plan: joint owner	Use for Section 529 education savings plan registered to joint owners. Best Practice: Fund is responsible for tax reporting unless level 3.	Retail			No
62	Section 529 plan: trust	Use for Section 529 education savings plan registered to a trust. Best Practice: Fund is responsible for tax reporting unless level 3.	Retail			No
63	S corporation	Use for accounts registered to S corporations, including incorporated entities and LLCs that elect to be treated as a corporation. Excludes partnerships (social code 52) and C corporations (social code 04). Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Institutional			No
64	Retirement plan super omnibus (non-prototype)	Use for non-prototype accounts representing only multiple retirement plans. Best Practice: Firm is responsible for tax reporting.	Retail/ Institutional*		Expect intermediary to look through to underlying shareholder(s) and make the appropriate classification of retail (natural person) versus institutional per regulation and fund prospectus.	No e

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
65	Transfer on death: individual	Use for a transfer on death account established for an individual account registration. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Retail			No
66	Transfer on death: joint tenant with rights of survivorship or tenants by entirety	Use for a transfer on death account established for a multiple owner registration. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Retail			No
67	Section 529 plan: entity	Use to distinguish an "entity" owning a 529 plan from other owners. An entity would be defined as university, foundation, scholarship fund, etc. Best Practice: Fund is responsible for tax reporting unless level 3.	Institutional		General use of this social code is for 529 plan accounts where the beneficiary is an entity.	No
68	Section 529 plan: corporate	Use for accounts with a Corporation owning a 529 Plan. Best Practice: Fund is responsible for tax reporting unless level 3.	Institutional		General use of this social code is for 529 plan accounts where the beneficiary is an entity or corporation.	No
69	457(b) plans: FBO participant name/account # (fund-prototype)	Use for fund-prototype 457(b) plans that are maintained in a participant FBO account. Best Practice: Fund is responsible for tax reporting.	Retail			No
70	457(f) plans (non-prototype)	Use for non-prototype 457(f) plans that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail			No
71	Non-qualified deferred compensation plan (non-prototype; not participant directed)	Use for non-prototype, non-qualified deferred compensation plans that are maintained in a plan level omnibus account. Participants do not direct investments in these accounts. Best Practice: Firm is responsible for tax reporting.	Institutional		Generally, the beneficiary does not control the account/assets of a deferred compensation plan until the plan is distributed; therefore, the plan is considered institutional (plan is the owner).	No

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72	Non-qualified 403(b) plans (non-prototype	Use for non-prototype, non-qualified plans that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ 16
73	403(b) plan FBO participant name/account (non-prototype)	Use for non-prototype 403(b) accounts maintained at the participant FBO level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ 16
74	Fund of funds: '40 Act registered	Use for '40 Act registered fund of funds account. Best Practice: Firm is responsible for tax reporting.	Institutional			Yes, FAQ #19
75	Fund of funds: Non–'40 Act registered	Use for unitized or non-'40 act registered fund of fund accounts. Best Practice: Firm is responsible for tax reporting.	Institutional			Yes, FAQ #19
76	IRA beneficiary distribution account (fund-prototype)	Use for beneficiaries or successor beneficiaries of traditional, rollover, SEP, SAR-SEP, or SIMPLE IRAs. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked. (Description modified: see Important Notice A #7827 posted 04/25/2014.)	Retail		May be used as a conduit account. The account would maintain its retail status until the assets are distributed. At the time of distribution, a categorization decision must be made as to whether the new account meets the retail definition or is considered institutional.	Yes, FAQ #17
77	Roth IRA beneficiary distribution account (fund-prototype)	Used for beneficiaries or successor beneficiaries of Roth IRAs. Best Practice: Fund is responsible for tax reporting.	Retail		May be used as a conduit account. The account would maintain its retail status until the assets are distributed. At the time of distribution, a categorization decision must be made as to whether the new account meets the retail definition or is considered institutional.	Yes, FAQ #17
78	401(k) plan FBO participant name/account # (non-prototype)	Use for non-prototype 401(k) accounts maintained at the participant FBO level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16

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79	Profit sharing plan FBO participant name/account # (non-prototype)	Use for non-prototype profit sharing plan accounts maintained at the participant FBO level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16
80	Money purchase pension plan FBO participant name/account # (non-prototype)	Use for non-prototype money purchase pension plan accounts maintained at the participant FBO level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16
81	Health savings account FBO participant name/account # (non-prototype)	Use for non-prototype health savings accounts (HSAs) maintained at the participant FBO level. Best Practice: Firm is responsible for tax reporting.	Retail			No
82	Government-sponsored plan (non-prototype)	Use for non-prototype government- sponsored plan accounts (described in Internal Revenue Service Code 414(d)) and maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail/ Institutional*		IRC Code section 414(d) outlines the general definition of a governmental plan, which includes both participant-directed plans (retail) and non-participant-directed plans (institutional). Expect intermediary to look through to underlying plans and make the appropriate classification of retail (participant-directed) versus institutional per fund prospectus.	No
83	Insurance company group trust or pooled separate account limited to retirement plan assets.	Use for insurance company accounts established to hold assets of the group trust or pooled separate accounts. Excludes insurance companies (social code 05). Best Practice: Firm is responsible for tax reporting.	Institutional			Yes, FAQ # 21

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
84	Investment clubs; unions; unincorporated association; miscellaneous organizations	Use for accounts registered to unincorporated associations (i.e., groups that have organized themselves under a specific name, but have not adopted any business form such as a corporation or partnership). Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Institutional			No
85	Estate account	Use for accounts registered to executors or personal representatives of an estate. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Retail		The account would maintain its retail status until the assets are distributed. At the time of distribution, a categorization decision must be made as to whether the new account meets the retail definition or is considered institutional.	Yes, FAQ #17
86	Fund of funds: '40 Act registered: retirement assets only (effective 07/28/2014)	Use for '40 Act registered fund of fund accounts that are limited to retirement assets. Best Practice: Firm is responsible for tax reporting.	Institutional			Yes, FAQs #19
87	Fund of funds: Non- '40 Act registered: retirement assets only (effective 07/28/2014)	Use for unitized or non-'40 act registered fund of fund accounts that are limited to retirement assets. Best Practice: Firm is responsible for tax reporting.	Institutional			Yes, FAQs #19
88	Coverdell ESA beneficiary distribution account (fund-prototype) (effective 07/28/2013)	Use for beneficiaries or successor beneficiaries of Coverdell employee savings accounts. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Retail			No
89	Individual retirement accounts: super omnibus (non-prototype) (effective 07/28/2013)	Use for non-prototype accounts representing only IRA assets for multiple IRA shareowners. Best Practice: Firm is responsible for tax reporting.	Retail			No

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
90	Simple 401(k) plan (non-prototype) (effective 07/28/2013)	Use for non-prototype Simple 401(k) plans that are maintained in a plan level omnibus account. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16
91	Simple 401(k) plan FBO participant name/account # (non-prototype) (effective 07/28/2013)	Use for non-prototype Simple 401(k) plans that are maintained at the participant FBO account level. Best Practice: Firm is responsible for tax reporting.	Retail			Yes, FAQ #16
92	Simple 401(k) plan FBO participant name/account # (fund-prototype) (effective 07/28/2013)	Use for fund-prototype Simple 401(k) plans that are maintained at the participant FBO account level. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Retail			Yes, FAQ #16
93	Single defined benefit plan (non-prototype) (effective 07/28/2013)	Use for non-prototype single defined benefit plan account (i.e., a defined benefit retirement plan with one participant). Best Practice: Firm is responsible for tax reporting.	Institutional			No
94	Non-U.S. governmental entities (effective 07/28/2013)	Use for accounts registered under non-U.S., foreign governments as well as subdivisions thereof. Best Practice: Fund is responsible for tax reporting, unless level 3 or trust networked.	Institutional			No

SOCIAL CODE	NSCC SOCIAL CODE DESCRIPTION	DEFINITION AND BEST PRACTICE	CATEGORIZATION	STATUS	COMMENTS	SEC FAQ Y/N
95	Trust-Institutional	Use when a bank or trust company acts as custodian or trustee for an underlying shareholder or entity (non-retirement). Accounts are registered in the firm's name under their TIN. Best Practice: Firm is responsible for tax reporting. Note: In the case of money market funds, this social code is to be used for instances where a natural person does not maintain the ability to exercise investment power, including the power to redeem (e.g., irrevocable trust or no trustee is a natural person).	Institutional		For further assistance in determining the retail/institutional categorization of a trust, please see Treatment of Ordinary Trusts Under the Retail Money Market Fund Definition. See DTCC Important Notice A# 8073 issued on August 27, 2015, for additional details regarding the implementation date of this social code.	No
99	Other (eliminate at a later date)		Retail/ Institutional*		This social code is still in use and has not been eliminated. See DTCC Important Notice A8301.	No

^{*}The Industry Working Group agreed that when a firm is unable to definitively determine that all beneficial owners of the account are natural persons, the common practice is to default to an institutional categorization. Decisions outlined within this document were based on the amendments to Rule 2a-7, the language within the SEC's adopting release, and the April 22, 2015, FAQs issued by the SEC.