

Full text for Figure 3: Heat Map of Allegations Against Public Companies and Subsidiaries (FY 2010–1H FY 2019). For each FY from 2010 through 2018 and the first half of FY 2019, the percentage of total allegations against public companies and subsidiaries during each of those time periods is shown for eight different allegation types. Each column represents a fiscal year (or fiscal half-year for 1H 2019), with the average from 2010 to 2018 shown in the first column, and each row represents an allegation type, with the total number of actions shown in the bottom row. On average from FY 2010 to FY 2018, Investment Advisor/Investment Company allegations accounted for 12% of total actions against public companies and subsidiaries; Issuer Reporting and Disclosure allegations accounted for 36%; Broker Dealer allegations accounted 12%; Foreign Corrupt Practices Act allegations accounted for 19%; Securities Offering allegations accounted for 5%; Public Finance Abuse allegations accounted for 9%; Market Manipulation allegations accounted for 2%; and Other allegations (actions categorized by the SEC as “Other” or “Transfer Agent”) accounted for 4%. On average, there were 59 actions filed annually between FY 2010 and FY 2018. In FY 2010, Investment Advisor/Investment Company allegations accounted for 6% of total actions; Issuer Reporting and Disclosure allegations accounted for 41%; Broker Dealer allegations accounted 10%; Foreign Corrupt Practices Act allegations accounted for 24%; Securities Offering allegations accounted for 6%; Public Finance Abuse allegations accounted for 4%; Market Manipulation allegations accounted for 0%; and Other allegations accounted for 8%. There were 49 actions filed in FY 2010. In FY 2011, Investment Advisor/Investment Company allegations accounted for 4% of total actions; Issuer Reporting and Disclosure allegations accounted for 33%; Broker Dealer allegations accounted 13%; Foreign Corrupt Practices Act allegations accounted for 35%; Securities Offering allegations accounted for 4%; Public Finance Abuse allegations accounted for 10%; Market Manipulation allegations accounted for 0%; and Other allegations accounted for 0%. There were 48 actions filed in FY 2011. In FY 2012, Investment Advisor/Investment Company allegations accounted for 10% of total actions; Issuer Reporting and Disclosure allegations accounted for 30%; Broker Dealer allegations accounted 10%; Foreign Corrupt Practices Act allegations accounted for 25%; Securities Offering allegations accounted for 8%; Public Finance Abuse allegations accounted for 10%; Market Manipulation allegations accounted for 5%; and Other allegations accounted for 3%. There were 40 actions filed in FY 2012. In FY 2013, Investment Advisor/Investment Company allegations accounted for 14% of total actions; Issuer Reporting and Disclosure allegations accounted for 49%; Broker Dealer allegations accounted 0%; Foreign Corrupt Practices Act allegations accounted for 14%; Securities Offering allegations accounted for 19%; Public Finance Abuse allegations accounted for 0%; Market Manipulation allegations accounted for 5%; and Other allegations accounted for 0%. There were 37 actions filed in FY 2013. In FY 2014, Investment Advisor/Investment Company allegations accounted for 10% of total actions; Issuer Reporting and Disclosure allegations accounted for 49%; Broker Dealer allegations accounted 14%; Foreign Corrupt Practices Act allegations accounted for 14%; Securities Offering allegations accounted for 4%; Public Finance Abuse allegations accounted for 4%; Market Manipulation allegations accounted for 2%; and Other allegations accounted for 4%. There were 51 actions filed in FY 2014. In FY 2015, Investment Advisor/Investment Company allegations accounted for 7% of total actions; Issuer Reporting and Disclosure allegations accounted for 22%; Broker Dealer allegations accounted 13%; Foreign Corrupt

Practices Act allegations accounted for 12%; Securities Offering allegations accounted for 0%; Public Finance Abuse allegations accounted for 39%; Market Manipulation allegations accounted for 1%; and Other allegations accounted for 5%. There were 82 actions filed in FY 2015. In FY 2016, Investment Advisor/Investment Company allegations accounted for 19% of total actions; Issuer Reporting and Disclosure allegations accounted for 26%; Broker Dealer allegations accounted 12%; Foreign Corrupt Practices Act allegations accounted for 20%; Securities Offering allegations accounted for 7%; Public Finance Abuse allegations accounted for 12%; Market Manipulation allegations accounted for 0%; and Other allegations accounted for 4%. There were 91 actions filed in FY 2016. In FY 2017, Investment Advisor/Investment Company allegations accounted for 18% of total actions; Issuer Reporting and Disclosure allegations accounted for 40%; Broker Dealer allegations accounted 12%; Foreign Corrupt Practices Act allegations accounted for 15%; Securities Offering allegations accounted for 0%; Public Finance Abuse allegations accounted for 0%; Market Manipulation allegations accounted for 6%; and Other allegations accounted for 8%. There were 65 actions filed in FY 2017. In FY 2018, Investment Advisor/Investment Company allegations accounted for 18% of total actions; Issuer Reporting and Disclosure allegations accounted for 34%; Broker Dealer allegations accounted 27%; Foreign Corrupt Practices Act allegations accounted for 13%; Securities Offering allegations accounted for 1%; Public Finance Abuse allegations accounted for 1%; Market Manipulation allegations accounted for 1%; and Other allegations accounted for 4%. There were 71 actions filed in FY 2018. In 1H FY 2019, Investment Advisor/Investment Company allegations accounted for 52% of total actions; Issuer Reporting and Disclosure allegations accounted for 21%; Broker Dealer allegations accounted 13%; Foreign Corrupt Practices Act allegations accounted for 12%; Securities Offering allegations accounted for 2%; Public Finance Abuse allegations accounted for 0%; Market Manipulation allegations accounted for 0%; and Other allegations accounted for 0%. There were 52 actions filed in 1H FY 2019.