

# COMPLY™ Comprehensive Private Fund Consulting Service Level



Navigate the complex and ever-changing compliance landscape with the support of our deep bench of consulting experts.

## Onboarding – The Set Up for Success

### WEEK 1:

#### WE WILL ASK YOU FOR THE FOLLOWING:

- IARD/FINRA Credentials
- Current ADV Part 2A
- Current version of Policies and Procedures
- Code of Ethics, Business Continuity/Disaster Recovery Plans, and Privacy Policy
- Roster of firm employees

### WEEKS 2-3:

#### ONCE WE HAVE IARD/FINRA CREDENTIALS AND THE ABOVE DOCUMENTATION, WE WILL:

- Import data provided into our proprietary MyRIACompliance site
- Provide initial documentation to Compliance Consultant for review
- Perform introductory Compliance Program Review with Compliance Consultant
- Configure customized Compliance Calendar
- Provide up to 3 dedicated software onboarding training sessions
- Provide bi-weekly office hours for onboarding questions and live support

## Ongoing Partnership – We are an Extension of Your Team



### CCO SUPPORT

- Schedule and lead compliance calls/Zoom/conference call
- Provide guidance on Regulatory Best Practices
- Share and discuss new rules, regulations, and the impact to your firm, plus implement updates accordingly
- Respond to compliance questions related to client's private fund compliance program (unlimited access)



### PRIVATE FUND FILINGS

- Form PF
- Form D
- Blue Sky



## PRIVATE FUND CALENDAR SUPPORT

- Fees
- Expenses
- Fund disclosures, extension terms, and liquidations
- Adequate due diligence of investments
- Adherence to contractual requirements
- Compliance with custody requirements
- Form ADV reporting
- Audits by qualified auditors
- Financial statement compilation and distribution
- Staying accurate and up to date on reporting events



## PRIVATE FUND MARKETING AND ADVERTISING

- Provide compliance expertise for client's private fund advertising initiatives
  - Watch for misleading statements
  - Check for inaccuracies
- Review marketing materials to ensure that they are current and contain required disclosures
- Types: website, social media, blogs, presentations, newsletters, business cards, etc.



## IARD SYSTEM MANAGEMENT

- Obtain Preliminary IARD Renewal Statement and provide instructions for funding client's FINRA EBill account
- Review Final IARD Renewal Statement and inform client of outstanding dues
- Monitor IARD Account for funding in connection with annual renewal and any other IARD filings
- Assist with IARD SAA User Account Certification Process



## FORM ADV

- Annual review of client's Form ADV disclosures for accuracy and completeness
- File client's Form ADV Annual Updating Amendment on IARD system
- Edit, complete, and file on IARD system client's Form ADV Part 1 and Part 2A



## CERTIFICATIONS

- Automate process for initial, quarterly, and annual attestations through MyRIACompliance (compliance manual, code of ethics, personal securities transactions, political contributions, social media)
- Provide guidance on quarterly review of personal trading activity
- Offer guidance on reviewing Annual Holdings Report Forms for client's Access Persons



## COMPLIANCE MANUALS

- Review and update client's Policies and Procedures Manual
- Review and update client's Code of Ethics



## BUSINESS CONTINUITY PLAN (BCP)

- Annual review of client's Business Continuity/Disaster Recovery Plan
- Update Business Continuity/Disaster Recovery Plan as needed



## PRIVATE FUND ANNUAL REVIEW AND RISK ASSESSMENT

- Help client with conducting annual compliance review and provide written report via MyRIACompliance's Annual Review Tool
- Identify private fund specific issues and risks, such as expense allocation, fund disclosures, compliance with custody requirements, extension terms, liquidations, and financial statement distribution
- Assist with documenting and remediation of compliance issues noted in the annual report
- Provide guidance on Risk Assessment and risk rankings post Annual Review



## TRAINING AND EDUCATION

- Create and deliver annual compliance meeting
- Offer online trainings available via MyRIACompliance
- Provide guidance on new rules and regulations



## REGULATOR EXAMS

- Provide preparation support for SEC exams
- Provide support during SEC exams
- Review client's response to document requests for SEC or state investment adviser exams
- Assist with responding to noted deficiencies and making required changes

## Add-On Services (Optional)



### CYBERSECURITY PROGRAM

- Provide cybersecurity program development and administration
- Prepare information security/cybersecurity policy and procedures
- Assist with incident response plan
- Offer ongoing training



### MANAGED SERVICES

- Email Review
- Code of Ethics Administration – Employee Trade Monitoring, OBAs, Gifts & Entertainment, and more



### ANCILLARY FORMS AND FILINGS

- Monitor and determine if client is subject to Form 13D, 13G, and 13F filing requirements and assist with process, if necessary



### REGISTRATION SERVICES

- Exempt Reporting Adviser (ERA) to SEC-registered transition



### COMPLIANCE REVIEWS

- Annual 206(4)-7 Review
- Compliance Program Review
- Mock Exam



### COMPLIANCE EDUCATION AND CONFERENCE

- Core Compliance Certificate
- IACCP® Designation
- COMPLYConnect

Talk to an expert today!

[sales@comply.com](mailto:sales@comply.com)

