

COMPLIANCE PROGRAM ROADMAP			
Regulatory Filings			
ū	Form ADV Annual Update		Form PF
ū	IARD User Entitlement Certification		IARD Registration Renewal
Compliance Training			
	Annual Compliance Training		
Reviews, Testing and Surveillance			
	Annual Review under Rule 206(4)-7)		Compliance Manual Review & Update
	Test 1: Custody Rule (Rule 206(4)-2)		Q1 Transactions report review
	Test 2: Marketing Rule (Rule 206(4)-1)		Q2 Transaction report review
	Test 3: Code of Ethics (Rule 204A-1)		Q3 Transaction report review
	Website Review		Q4 Transaction reports review
	Email Surveillance		Annual Holdings report review
Employee Certifications & Attestations			
	Compliance manual & Code of Ethics		Disciplinary Questionnaire
	Electronic Communications		Conflicts of Interest – Political Contributions, Gifts, OBAs, etc.
Compliance Meetings			
	January		July
	February		August
	March		September
	April		October
	Мау		November
	June		December