



OUTSOURCED COMPLIANCE DEPARTMENT SERVICES



Our Outsourced Compliance Department (“OCD”) services are built to replace and simulate an in house compliance team. You are assigned a Compliance Manager and at least two compliance analysts who will run your compliance program.

	OCD	OCD+
IAR Onboarding:	✓	✓
<ul style="list-style-type: none"> • Background check by Sterling (@cost) • U4 filing and 2B preparation • Transmission and review of initial compliance documents and attestations (including OBAs, personal securities transactions) • 60-minute compliance onboarding call 		
U4 and U5 reviews and updating	✓	✓
Form ADV Part 2B reviews and updating	✓	✓
Form ADV Part 1 review and updating	✓	✓
Form ADV Part 3/Form CRS review and updating	✓	✓
Annual 1 on 1 interviews with IARs	✓	✓
Annual Amendment preparation and filing	✓	✓
Annual Compliance Review and Report	✓	✓
Annual Retrospective Review	✓	✓
Annual Personal Holdings Review	✓	✓
Annual 13H report	✓	✓
Annual Best Execution Review	✓	✓

	OCD	OCD+
Annual Compliance Meeting	✓	✓
Annual Client Account Review Testing	✓	✓
Annual Custody Review	✓	✓
Quarterly 13 F Report	✓	✓
Quarterly Personal Securities Transactions Review	✓	✓
Quarterly Code of Ethics Attestations Review	✓	✓
Quarterly IAR state registration review	✓	✓
Quarterly Social Media and Website review	✓	✓
Quarterly Code of Ethics Certification Review	✓	✓
Quarterly Personal Securities Transaction Review	✓	✓
Quarterly or Monthly Fee Audit	✓	✓
Quarterly OBA Audit	✓	✓
Quarterly Branch Audit	✓	✓
Quarterly Client File Review	✓	✓
Monthly Trade Error Log Review	✓	✓
Monthly DOL Rollover Form Testing	✓	✓
Weekly Trade Review	✓	✓
Weekly Text Message Review	✓	✓
Advertising Review	✓	✓
Cybersecurity Review	✓	✓
Response to routine state regulatory inquiries	✓	✓
Succession planning		✓
Vendor due diligence		✓
Alternative Products Due Diligence		✓
Participation in Investment Committee		✓

Ongoing training of compliance and products with staff	✓	✓
Heightened Supervision Oversight		✓
AUDIT SUPPORT: Respond to questions and provide guidance on response to regulators	✓	✓
AUDIT SUPPORT: Prepare Responses	✓	✓
AUDIT SUPPORT: Review responsive documents and Bates number		✓
AUDIT SUPPORT: Communicate with regulators on behalf of firm		✓
AUDIT SUPPORT: Be present on site for in person portion of exam		✓
AUDIT SUPPORT: Phone support during on site portion of exam	✓	✓
Respond to client complaints filed directly with state regulators or the SEC		✓
LEGAL: Review and update IMA	✓	✓
LEGAL: Review and update ERISA Fiduciary Agreement	✓	✓
LEGAL: Review and update IAR Agreement		✓
LEGAL: Review and update non-IAR employment and 1099 agreements		✓
LEGAL: 5 hours billable hour time with legal staff		✓
Development of customized compliance forms	✓	✓
Books and records management		✓
Compliance technology set-up and maintenance	✓	✓
Mandatory 60-minute call per month	✓	✓
1 60-minute call with IARs monthly	✓	✓
2 on site visits annually (cost of travel not included)		✓
Designated Chief Compliance Officer		✓