

**Polar Investment Counsel Inc.**

Member: FINRA, NFA, MSRB, SIPC  
Securities Cleared: Hilltop Securities Inc.  
Member NYSE, FINRA, SIPC

**2019 Annual Compliance Program Attestation**

This is to certify that I, the undersigned representative/associate, have completed the PICI annual compliance package that consists of:

- Annual Compliance Certification
- Annual Compliance Meeting
- Letter of Supervisory Understanding
- FINRA Form U4 Review
- Outside Business Activities
- Quarterly Review Readings

**UNDER PENALTIES OF PERJURY, I CERTIFY THAT THE INFORMATION SUBMITTED ELECTRONICALLY IS TRUE AND CORRECT.**

\_\_\_\_\_  
Registered Rep / Associate Signature

\_\_\_\_\_  
OSJ Branch Manager Signature (if applicable)

\_\_\_\_\_  
Registered Rep/Associate Printed Name      Dated

\_\_\_\_\_  
OSJ Branch Manager Printed Name      Dated

Rep ID: \_\_\_\_\_ Office: \_\_\_\_\_

Rep ID: \_\_\_\_\_ Office: \_\_\_\_\_

**As Chief Compliance Officer, I have reviewed the information submitted electronically:**

\_\_\_\_\_  
PICI CCO Signature  
Sherry L Abbott, EVP, CCO, CFO

Dated: \_\_\_\_\_

**As Chief Executive Officer, I have reviewed the information submitted with the CCO:**

\_\_\_\_\_  
PICI CEO Signature  
Michael Jordan, President, CEO

Dated: \_\_\_\_\_

**Home Office Use:**

CRP Required: ☐ Yes ☐ No

CRP Received: ☐ Yes ☐ No

**Comments:**