



Polar Investment Counsel Inc

2020 Compliance Meeting Outline

- Welcome

- Regulatory Matters
 - Polar Compliance – No “Gottcha” Here

- Hilltop Securities Inc
 - FISMO – new trading system

- SEC Rule Reg BI & Form CRS
 - What It Is and Why We Have It
 - When To Send It and How To Document It
 - Consequences of Not Following Procedures

- Compliance Program
 - CIB – Customer Information Brochure
 - ACC – Annual Compliance Certification
 - LOSU – Letter of Supervisory Understanding

- General Compliance Stuff
 - Firm Policies and Procedures
 - Monthly Blotters & Form CRS-New & Recommendations

- Money Movement
- Client Debits
- Mutual Fund Transactions - Fees
- Client Accounts
 - Opening Accounts
 - Changes to Accounts
 - Closing Accounts
 - Death of a Client
- Record Keeping
- Low priced Securities
- Trade Errors
- Suitability
- Compliance Reporting
- Attestations
 - Customer Complaints
 - Criminal Arrests
 - Civil Actions

- Bankruptcy filings, Judgements, liens, compromises with creditors

➤ AML Training

- Red Flags
 - Customer Clues
 - Activity Clues
 - Cash Clues
- HTS AML Reports – Report Distribution
- Your Role

➤ Product Types

- ETFs
- Fixed Income
- Trade Reporting
 - TRACE
 - MSRB
- Municipal Trading
 - Muni Bonds
 - 529 Plans

➤ Cyber Security

○ Cyber Attacks

- All devices are vulnerable
- Protect yourself

○ Email

○ Social Media

➤ Conclusion

Please be sure to complete the short review questions on the firm's compliance meeting webpage. That submission of your response to the questions signifies your attendance of the meeting.

Thank you
PCI Compliance