

## Polar Investment Counsel Inc 2023 Compliance Meeting Outline

## Welcome

- Year in Review
- Regulatory Matters
  - o Polar Compliance No "Gottcha" Here
  - FINRA Broker CE system: FINPro
- Hilltop Securities Inc.
  - FISMO HTS Trading System
  - Read Email Notices From HTS
  - Edelivery Customer Documents
- 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
  - Recommendations & Rollovers
- Compliance Program
  - CIB Customer Information Brochure
  - o ACC Annual Compliance Certification
  - LOSU Letter of Supervisory Understanding
  - Ethics Training Futures Doc Applicable for All
- General Compliance Stuff
  - Firm Policies and Procedures
    - Monthly Blotters , Form CRS-- Delivery & Recommendations and Client Correspondence
    - Money Movement Fund Disbursement Processing
    - Account Debits
    - Mutual Fund Transactions Fees
  - Client Accounts
    - Account Opening-Updating-Closing
    - Death of a Client
    - Registered Person Trust/Beneficiary
  - Record Keeping
  - Low priced Securities
  - Trade Errors
  - Suitability

## Polar Investment Counsel Inc 2023 Compliance Meeting Outline

- 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
  - o HTS AML Reports Report Distribution
  - o Your Role
- Product Types
  - o ETFs
  - Cryptocurrency & Cannabis Stocks
  - Trade Reporting
    - TRACE
    - MSRB
    - CAT CAIS
  - Municipal Trading
    - Muni Bonds
    - 529 Plans
- Cyber Security
  - Cyber Attacks
    - All devices are vulnerable
    - Protect yourself
  - o Email
  - Social Media
- Conclusion

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

Thank you

**PICI Compliance**