



Polar Investment Counsel Inc

2024 Compliance Meeting Outline

➤ Welcome

- Year in Review

➤ Regulatory Matters

- Polar Compliance – No “Gottcha” Here
- FINRA – Financial Professional CE System: FINPro

➤ Hilltop Securities Inc

- FISMO – HTS Trading System
- Read Email Notices From HTS
- Edelivery Customer Documents
- New Account Opening Charges

➤ 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
- DOL PTE Rule Amendment - Recommendations & Rollovers

➤ Compliance Program

- CIB – Customer Information Brochure
- 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
- 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
- Cryptocurrency & Cannabis Stocks
- Trade Reporting
 - TRACE
 - MSRB
 - CAT - CAIS
- Municipal Trading
 - Muni Bonds
 - 529 Plans

➤ Cyber Security

- Cyber Attacks
 - All devices are vulnerable
 - GEN Malware Stats

- Email
 - Texting With Clients Not Allowed
 - FINRA Phishing Campaign (full article will be emailed separately)
 - 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