

# The Full 360<sup>o</sup> Compliance View Washington DC 2020

## 2020 AGENDA

### Day 1

7:30	<b>Registration: Meet our Exhibitors and Enjoy Breakfast</b>	10:30	<b>Pay-to-Play in an Election Year</b> With the upcoming Presidential election around the corner, campaign season is in full swing. Review your firm's pay-to-play, gifts and entertainment, and code of ethics policies now to help avoid future violations. We will review: <ul style="list-style-type: none"><li>• Current rules and lessons learned from enforcement actions</li><li>• Being cognizant of state or municipal level rules, which could be more restrictive</li><li>• How can you train employees?</li><li>• What are best practices to monitor your firm for potential violations?</li></ul>
7:30	<b>CCO-Only Think Tank</b> As a CCO, you often face the challenges and obstacles that come with managing your firm's compliance alone. Luckily, we have gathered an invitation-only, close-door room of your peers. We welcome you to participate in a collaborative exchange of strategies and best practices that will give you the opportunity to access perspectives to rejuvenate your compliance program. <i>(Invite-only)</i>		<p>You will leave with a refresher on what you need to do to monitor your staff and keep your staff from violating.</p>
8:25	<b>Chairman Welcome by Hugh Kennedy</b>		
8:30	<b>Hot topics: Ensure You Are Ready for Upcoming Regulatory Changes</b>		
9:00	<b>Fiduciary Duty &amp; Best Interest</b> The new regulation best interest rule deadline is around the corner. Here's what you need to know: <ul style="list-style-type: none"><li>• Form CRS - what disclosures should be made and how?</li><li>• What is the implication of compliance controls with this new regulation?</li><li>• How should you demonstrate your fiduciary responsibilities (for investors, regulators, and financial advisors)?</li><li>• How should firms' evidence that their recommendations are in the client's best interest?<ul style="list-style-type: none"><li>◦ Use of documentation, CRM systems, surveillance efforts, testing and otherwise</li></ul></li></ul> <p>You will leave our panel with a checklist of what should be included in your Form CRS and the ways you can revamp your compliance program to incorporate the new best interest rule.</p>	11:30	<b>Business Continuity Plan: Managing Risk Throughout its Entire Cycle</b> An emergency can throw a wrench in your daily business operations at a moment's notice. Key issues that we will cover that can help: <ul style="list-style-type: none"><li>• Disaster stories told by your peers and the lessons they learned along the way</li><li>• The importance of plan testing:<ul style="list-style-type: none"><li>◦ Does your plan go far enough?</li><li>◦ Proven ways to thoroughly test your plan</li><li>◦ Who should be involved in the testing?</li><li>◦ Lessons learned from past disaster relief events and new procedures put in place</li></ul></li></ul> <p>Leave with a reminder of the steps you should take now to give your business the right tools to continue operating in the face of a potential disaster.</p>
10:00	<b>Refreshment Break</b>	12:30	<b>Lunch</b>

# The Full 360° Compliance View Washington DC 2020

## 1:30 Breakout sessions

### Conflicts of Interest and Disclosure

Conflicts of interest come in many shapes and sizes and are not always easy to spot. You will get guidance on:

- What are some common conflicts related to advisory activities?
- How to inventory conflicts of interest that are material to your business?
- How you can train advisers to identify and disclose conflicts and the steps you can take once they have been identified?
- What are reasonable policies and procedures to identify and mitigate any conflicts of interest?
- What are recommended ways to track employee's gift, entertainment, personal trading, outside business activities, and political contributions?
- How you should you track and disclose conflicts on your Form ADV?

You will leave with the tools you need to effectively track and monitor your firm's conflicts.

### Custody Rule

Custody rule is complex and can feel like an inconvenience when your firm is doing business with your clients. We will help demystify custody by reviewing:

- What constitutes custody status?
- What are some things that can trigger custody status?
- How can you best handle inadvertent custody?
- What are some best practices to ensure you are compliant?
- What are variables you should consider in reviewing your firm's compliance procedures?
- What P&Ps should you have in place to be prepared for your annual surprise exam?
- A discussion of any custody issues that came up on recent OCIE examinations

You will leave with resources and best practices to clarify your understanding of the custody rule in a way that will support more seamless interactions with clients.

## 2:30 Refreshment Break

### 3:00 Ways to Ease Your Compliance Burdens Through Technology

As the amount of information under a CCO's domain continues to grow, it is increasingly important that CCOs are operating with a system that is as effective, precise, and organized as possible to promote cost-saving. We will review:

- How technology can help manage and monitor your firm's electronic communication, trade surveillance, document management, code of ethics, investment restrictions and compliance case management?

- What you need to consider when you research automation tools?
- How you can find a balance between manual and automated compliance that will minimize error and maximize effectiveness?
- How you can test your automation tools?
- What are some recommended technology resources?

You will leave with a guide to organize and check your firm's automation resources in a way that will make your compliance program run as smoothly as possible.

# The Full 360° Compliance View Washington DC 2020

## 4:00 **Best Practices from Your Peers Roundtables**

Although you may think your compliance program is running as efficiently as possible, there is always room for improvement. You will have the opportunity to sit down with your peers and participate in an exchange of lessons learned and best practices on the compliance issue of your choice. Choose from the following:

- Developing a training program
- Fees and expenses/Cash solicitation
- New SEC guidance on oversight of proxy advisory firms and proxy voting
- Working with senior clients
- Overcoming the challenges women face in compliance
- Cybersecurity
- Liquidity risk management

## 5:00 **Closing Remarks by Hugh Kennedy**

## 5:05 **Conference Adjourns**

## 5:05 **Cocktail Reception**

## Day 2

## 7:45 **Breakfast**

## 8:25 **Welcome Back from Hugh Kennedy**

## 8:30 **SEC Exam Super Session**

The number of SEC exams are at historic highs, exceeding 3,000 annual exams, so it is increasingly important that you have the latest insight on current exam focus areas, priorities, and best practices.

### **Keynote: Current SEC Trends**

- What are common deficiency areas and how can you avoid them?
- Which risk areas could be the focus of future sweeps?

## 9:00 **Workshop: Preparing For an Audit**

- What are suggested steps you can take throughout the year to increase your preparedness (ex: mock exams)?
- Which documents are most often included in the request list?
- Importance of an open dialogue: Be prepared and transparent with examination staff
- Who should be involved in your firm's exit interview?
- How to respond to your firm's deficiency letter in a way that specifically addresses how your firm is going to rectify each item?

What post-deficiency action have your peers taken to remedy their deficiencies? Leave armed with trends and best practices that will help your firm navigate the exam experience as smoothly as possible.

## 9:30 **Advertising and Marketing Rule**

Although there has been speculation of a new advertising rule, here's how you can make the existing rules fit today's advertising methods in the meantime. Leave with guidance on the following:

- Have you inventoried which marketing collateral contains performance from third parties and are you able to produce the backup?
- What constitutes a testimonial and why should you ban them?
- How can you train your staff to use social media that considers current technologies and meets the current rule's restrictions?
- Are you appropriately archiving social media in accordance with record keeping requirements?
- What are the important regulation takeaways that your marketing staff needs to understand?
- What are some commonly used terms or phrases that you should avoid and what you can say instead?
- What steps can you take to test or confirm performance data from third party providers?

Through the use of "real life" scenarios, our panelists will demonstrate best practices for you to consider, this session will provide you with tactics that will help energize your advertising program.

# The Full 360<sup>o</sup> Compliance View Washington DC 2020

10:30 **Networking Break**

10:50 **Leadership and Working with Your C-Suite**

Disconnect between your CCO and the rest of your c-suite could result in your firm being unprepared for a potential crisis. We will cover the following c-suite collaboration and leadership tips:

- What are best practices for performing CCO management responsibilities?
- How to best wear multiple hats?
- How you can lead a compliance program that promotes an open line of communication with investors?
- How can you relate to the c-suite and present your compliance program in a way that conveys the critical role it plays in your firm's overall success?
- Who are the key players that CCOs should collaborate with?
- What are the effective ways of reporting your annual review/compliance violations to senior management?

Leave with solutions that will help bridge the gap between your firm's CCO and c-suite in a way that fosters your firm's compliance.

11:50 **Vendor Management in Cybersecurity**

Since you are only as secure as the vendors who have access to your data, your firm's cybersecurity starts with effective vendor management. Here are the key variables you should consider:

- Creating a plan and checklist
- What you should include on your firm's Due Diligence Questionnaire?

- What other types of due diligence do you perform during onboarding and on an ongoing basis?
- What are the benefits of having your IT team involved in the process?
- What steps do you need to take when terminating a vendor to safeguard your firm's and investor's data?

This session will give you the tools to create not only a thorough vendor management process for vendors responsible for maintaining your cybersecurity, but considerations that you can apply to managing your other vendors as well.

12:50 **Lunch & Closing Remarks**

1:50 **Conference Adjourns**

1:50 **Transition to Workshop**

2:00 **SEC Exam Preparation Workshop**

In order to have the best outcome on your SEC exam, preparation is key. We will walk you through the steps you need to take before, during, and after your exam to ensure the most successful outcome. You will leave with actionable insights and a toolkit filled with resources that will guide you through every step of the process.