

MARKETING RULE IMPLEMENTATION CHECKLIST

FIRM NAME:

DATE COMPLETED	CHECKLIST ITEMS
	<p>SCHEDULE DATE OF IMPLEMENTATION</p> <ul style="list-style-type: none"> When does your Firm look to implement the new Marketing Rule? It will take some time for all the tasks below so plan accordingly.
	<p>CCO TRAINING</p> <ul style="list-style-type: none"> Have the Compliance team review educational materials regarding the new Rule, including CRP's TMIC and TMR (May, June, July).
	<p>REVIEW CURRENT ADVERTISEMENTS</p> <ul style="list-style-type: none"> Review current pitch books, RFP responses, newspaper or magazine ads, website, social media, brochures, and other written collateral (but not ADV brochures), radio/TV/podcasts.
	<p>REVIEW CURRENT THIRD-PARTY RANKING/RANKINGS USED</p> <ul style="list-style-type: none"> Review use of all third-party ratings used in current advertising to ensure updated disclosures are being used.
	<p>CREATE A LIST OF ALL SOLICITOR AGREEMENTS</p> <ul style="list-style-type: none"> Review all current arrangements: <ul style="list-style-type: none"> Cash solicitation arrangements under existing Rule 206(4)-3 Unpaid or non-cash referral arrangements Internal sales efforts (sales by adviser's employees or affiliates) Directed brokerage arrangements "Refer-a-friend" programs
	<p>UPDATE DOCUMENTS TO PROMOTER (IF APPLICABLE)</p> <ul style="list-style-type: none"> Review suggested agreement and disclosure language in this TMR and tailor as needed. Reference to Promoter is used in Part 2A and Form CRS. Add additional language to Investment Management Agreement (if applicable). Repaper all Solicitor Agreements to new Promotor Agreements. (Updated Promotor Agreement was provided in the June This Month in Compliance)
	<p>UPDATES TO ADV PART 1 QUESTIONS</p> <ul style="list-style-type: none"> Firms will need to review and complete ADV Part 1- Item 5.L questions with the annual update and will file in first quarter 2023.
	<p>TAILOR MARKETING COMPLIANCE POLICIES AND PROCEDURES</p> <ul style="list-style-type: none"> Use CRP suggested updates to Marketing Rule Policies and Procedures. Tailor as needed to what your firm is adopting use of, Remove old Rule references.
	<p>REVIEW AND REVISE DISCLOSURES USED ON CURRENT MARKETING MATERIALS</p> <ul style="list-style-type: none"> Review disclosures used on Testimonials, Endorsements, Third Party Ratings, Performance, General Newsletters or social media content, Website Content
	<p>AMEND COMPOSITE AND PERFORMANCE METHODOLOGIES</p> <ul style="list-style-type: none"> Review disclosures used on Performance Advertising (if applicable)
	<p>CONDUCT IAR TRAINING FOR MARKETING RULE</p> <ul style="list-style-type: none"> CRP will provide a PowerPoint for firm training in the July 15 TMR.

NOTES: CRP will be available to discuss or assist in implementing any of the items above.