

CCO Checklist

January 2021	Date Completed
Distribute Compliance Manual and collect annual certification of compliance with Code of Ethics- Due annually by all- <i>Annually</i>	<input type="checkbox"/>
Review Final Renewal Statement on IARD System- Review IARD Final Renewal Statement for annual state/individual registrations; CRP will send a copy for review; fund any balance due. - <i>Annually</i>	<input type="checkbox"/>
Review Form ADV Part 1, Part 2A Brochure, Wrap Fee Brochure (if applicable) and Part 2B Brochure Supplements.- Required annually by CCO. - <i>Annually</i>	<input type="checkbox"/>
Annual Amendment Updating- Please complete the attached ADV Questionnaire and send to your CRP representative. In addition, please add funds to your Flex Account to cover the filing fees. *SEC Advisers* \$225 SEC filing fees. *State Advisers*, fees vary for each state. - <i>Annually</i>	<input type="checkbox"/>
Annual IAR Review & Attestations- Please see the CRP template and tailor to your firm. CCO will distribute to IARs for completion. Upon completion by IAR, CCO will review. - <i>Annually</i>	<input type="checkbox"/>
Review definition of Regulatory Assets under Management - Determine Firm's AUM as of 12/31. Retain documentation in file with appropriate back up of AUM numbers. - <i>Annually</i>	<input type="checkbox"/>
Cybersecurity Review and Test - Review and test cybersecurity policies for employee education, phishing, penetration testing, new vendor due diligence, update incident response plan. - <i>Annually</i>	<input type="checkbox"/>
Review Firm Privacy Policy- Ensure the sharing of client data is accurately reflected. Add any affiliations that may share client information. - <i>Annually</i>	<input type="checkbox"/>
Federal Filings Review--**ONLY SEC Firms with \$100m+ Equities and ETFs** (JANUARY) - Review Year-End Holdings Report for Potential 13-H/F/G/D Required Filing. Schedule 13D and certain 13G filings are required to be filed, at any time during the year, within 10 days of the initial triggering transaction and filing requirements remain continuous, not only at year end. Filing dates are 45 days after quarter-end. – <i>Quarterly</i>	<input type="checkbox"/>
Review Best Execution Report - Obtain Best Execution Report from Custodian. Review and document review in file. - <i>Quarterly</i>	<input type="checkbox"/>
Review Billing Statements/Fee Calculations Report - Review billing statements/fee calculations report from custodian or billing program; take any necessary corrective action and document review; maintain in books and records. - <i>Monthly or Quarterly</i>	<input type="checkbox"/>
Review Political Contributions - Review Political Contributions made by supervised persons from previous quarter to ensure compliance with Pay to Play Rule. - <i>Quarterly</i>	<input type="checkbox"/>
Quarterly Compliance Meeting with Management- Review any compliance matters that have arisen since the last regular meeting. - <i>Quarterly</i>	<input type="checkbox"/>

<p>Quarterly Personal Securities Transaction Reports. - CCO will complete a review of each personal securities transaction against the quarterly transactions report of the firm. During the review the CCO will look for possible prohibited activity by IARs and keep all reports on file. - <i>Quarterly</i></p>	<input type="checkbox"/>
<p>Review of Terminated Accounts- Obtain a report that allows you to verify that amounts refunded to terminated client accounts are accurate and in accordance with your firm's procedures. -Quarterly</p>	<input type="checkbox"/>
<p>Review Trade Blotter- Download Blotter from Custodian and review for any irregular trading patterns, trade errors, trade discrepancies or large amounts of trading in one account. – Weekly or <i>Monthly</i></p>	<input type="checkbox"/>
<p>Correspondence and Email Review- Review staff correspondence, including email. -<i>Weekly or Monthly</i></p>	<input type="checkbox"/>
<p>Review of Company Financials- The CCO should review the company's accounting records to confirm the company is in compliance with its home state's net capital requirements. If the firm is SEC registered, please make sure the company is solvent at all times. - <i>Monthly</i></p>	<input type="checkbox"/>

