

Navigating the New OCIO GIPS® Guidelines

Unlocking Value with the
Updated OCIO GIPS® Standards

Expect It.
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OCIO GIPS® Reporting Becomes Mandatory December 31, 2025

On December 31, 2025, new GIPS® requirements for OCIO (Outsourced Chief Investment Officer) portfolios take effect. This represents a fundamental shift in how firms must calculate, structure, and present performance to prospective clients.

The Challenges Facing OCIOs

Meeting these standards requires more than a disclosure update. Firms must redesign data processes, reporting structures, and benchmark methodologies. Key challenges include:

▶ **Data aggregation and composite structuring**

- Consolidating multiple asset classes and portfolios
- Mapping strategies into risk “buckets” based on policy mandates
- Calculating net-of-fees returns under both GIPS and SEC Marketing Rule

▶ **Complex benchmark construction**

- Assigning appropriate benchmarks
- Building blended or portfolio-weighted hybrids across strategies

▶ **Reporting format requirements**

- Producing outputs that comply with GIPS while offering flexibility to customize prospect-facing reports

▶ **Managing legacy assets**

- Determining how illiquid or inherited holdings affect discretionary status and composite inclusion

These requirements create significant operational strain, often diverting resources from investment oversight and client engagement.

How Confluence Supports OCIO GIPS Compliance

Confluence provides the infrastructure to operationalize compliance while maintaining efficiency and consistency. Our integrated platform enables firms to:

1. **Create required composite structures** aligned to liability-focused and total return strategies.
2. **Automate calculations and disclosures** for net-of-fees, gross-of-fees, and transaction-cost-adjusted returns.
3. **Construct blended benchmarks** and portfolio-weighted benchmarks with precision.
4. **Generate GIPS-compliant reports** that combine standardized outputs with client-ready customization.
5. **Facilitate verification** with outputs built for third-party review.

A Unified Workflow for Compliance and Performance

Confluence consolidates performance reporting and GIPS compliance within one ecosystem:

- ▶ **Single workflow** for GIPS and PBOR (Performance Book of Record)
- ▶ Consistent, **audit-ready calculations** across all outputs
- ▶ **Streamlined data transformation** and composite creation
- ▶ **Enhanced peer comparisons** with Plan Universe analytics

By embedding compliance into everyday performance reporting, firms reduce risk, accelerate reporting cycles, and strengthen transparency with clients and prospects.

December 31 is more than a deadline—it is the start of a new standard for OCIO compliance. Confluence ensures you are not only compliant but positioned to lead.

Confluence has been the leader in GIPS and Composites management for the last three decades.

Contact us now to discuss any aspect of Composites management.



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Confluence is a global leader in enterprise data and software solutions for regulatory, analytics, and investor communications. Our best-of-breed solutions make it easy and fast to create, share, and operationalize mission-critical reporting and actionable insights essential to the investment management industry. Trusted for over 30 years by the largest asset service providers, asset managers, asset owners, and investment consultants worldwide, our global team of regulatory and analytics experts delivers forward-looking innovations and market-leading solutions, adding efficiency, speed, and accuracy to everything we do. Headquartered in Pittsburgh, PA, with 700+ employees across North America, the United Kingdom, Europe, South Africa, and Australia, Confluence services over 1,000 clients in more than 40 countries.

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