

Confluence Compliance Services


Make Our Experts Your Experts

Our team of regulatory experts, including former chief compliance officers and regulators, leverage their experience along with our compliance management and regulatory reporting tools to help your compliance team build, optimize, test and manage compliance programs tailored to your unique needs. Our broad industry expertise is your competitive advantage for greater efficiency and scalability.


Expect It.
confluence.com




How Confluence Compliance Services Can Help



We can analyze your existing compliance and regulatory processes, provide recommendations for improvement, and serve as a resource in addressing risk and other challenges.

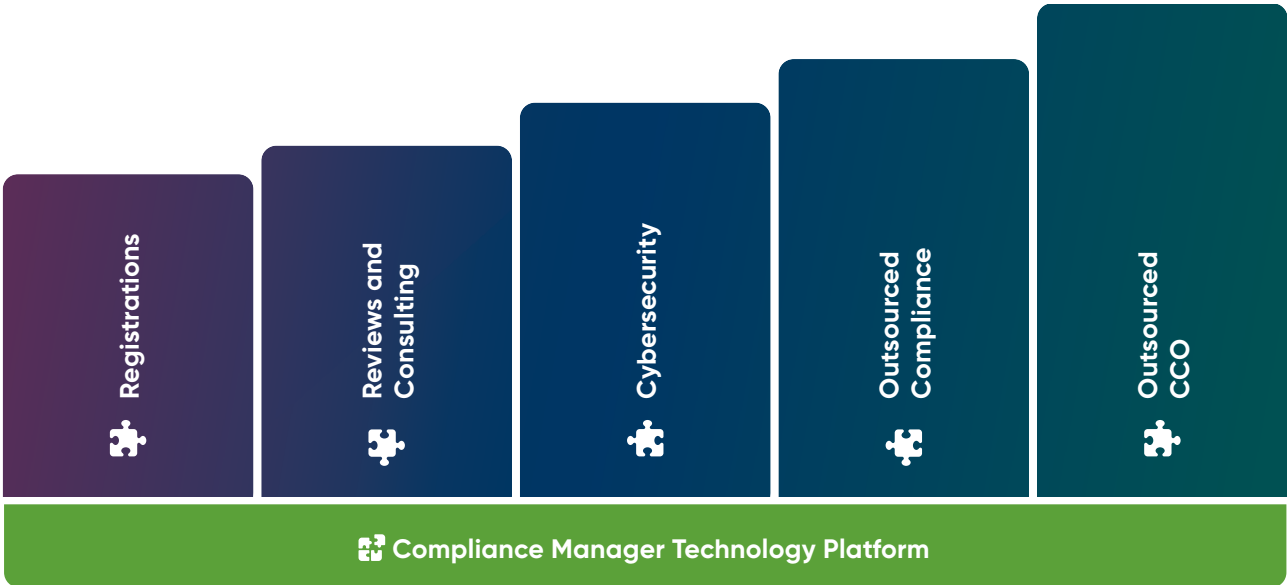


Outsourcing specific compliance processes and tasks to an automated solution or a trusted managed service partner can help you strengthen compliance while reducing your operational costs.



We can help you to operationally plan and implement your future compliance strategy to mitigate risk, increase efficiency and scalability, and derive more value from your data.

End-to-End Solutions



Confluence offers end-to-end compliance management solutions with the flexibility to **build a highly efficient program** that meets your needs – from initial registration and establishing a new compliance program to evaluating or outsourcing your current program. Our team of experts is committed to helping you identify your needs and developing solutions that work for your unique business. Our proprietary technology platform supports our solutions.

Our Strength is Our Team

Our senior team averages 25 years of industry experience.

Our team remains current with industry trends and service offerings. We have walked in your shoes and understand the challenges you face, from meeting regulatory requirements and managing risk, to the business issues of staffing, managing multiple priorities, and working within budget considerations.

"Sonora Investment Management Group, L.L.C. has been partnering with Confluence since 2021. We work closely with a team of dedicated consultants, who bring their own expertise to the relationship. Confluence works with many different investment professionals and firms, and is knowledgeable of the latest rules, regulations, and technologies. At the highest level, they provide firms with solutions, adding value to various regulatory requirements and most importantly – peace of mind. This great partnership allows our firm to focus on what we do best. Working with a leading compliance company is crucial as we strive to maintain a solid compliance program."

– Chief Compliance Officer



Who We Serve

Understanding that firms have unique compliance challenges and priorities, our tailored approach encompasses all areas of the financial advice industry.



Asset Managers

- ▶ Institutional Advisers
- ▶ RICs (Mutual Funds, ETFs, BDCs)

Wealth Managers

- ▶ Retail Advisers
- ▶ RIA Aggregators
- ▶ Turnkey Platforms

Private Funds

- ▶ Hedge Funds
- ▶ PE/PD Funds
- ▶ Real Estate
- ▶ Exempt Reporting Advisers

Broker-Dealers

- ▶ Fund Distributors
- ▶ Dual Registrants
- ▶ Introducing Broker-Dealers

Compliance and Cybersecurity Services

U.S. Regulatory Reporting Services

Reviews and Consulting

Confluence works hand-in-hand with your team to develop and deliver the compliance guidance that your firm needs. Whether meeting annual compliance reviews, testing your exam preparedness, implementing new rules, assessing risk, or any other consulting engagement, we target your unique needs efficiently and effectively.

Our reports and recommendations are specific, actionable and tailored to your organization. Our reviews conclude with customized reports and actionable steps to help mitigate risks – taking your program from tactical to strategic compliance.

Annual reviews

We review the adequacy of the firm's compliance policies and procedures and the effectiveness of their implementation, considering the rules, regulations, and best practices applicable to your business. Our detailed written reports document the review, citing both observations of excellence and recommendations for improvement.

Mock Exams

We simulate a regulatory exam to test your readiness for the real thing. We provide real-time, actionable advice to help you better prepare. Our experience guiding clients through regulatory exams gives us deep insight into regulators' expectations.

Risk Assessments

Our risk assessment process identifies the critical risks to your business and maps your controls to mitigate those risks.

Policies and Procedures

Keeping policies and procedures current with your changing business and regulatory environment can be a constant challenge. We help you update and maintain your compliance policies and procedures, taking into consideration risk alerts, regulatory priorities, and enforcement trends.

Targeted reviews
(AML, Fees, Marketing, DOL Retrospective, Hot Topics)

Have recent changes to your business or new rules affected specific processes? We'll dive deeply into your defined target areas to evaluate your policies, procedures, and controls.

Exams and Enforcement

When a regulatory examination results in findings, firms should act swiftly and decisively to address the regulator's concerns. We help firms by providing strategic solutions for mitigating exam risk or deficiencies. We also help firms develop and implement a remediation plan, which is a critical factor regulators consider before initiating deficiencies or enforcement proceedings.

If an enforcement settlement requires an outside consultant, we have a proven track record of executing a remediation plan and interacting with the regulators to bring that phase to a successful conclusion.

Ongoing Support

Our annual engagements include regular meetings and ongoing access to our experts throughout the year – so as questions arise, we're here to help.

Outsourced CCO

Some firms find that outsourcing the chief compliance officer (CCO) function is an effective way to manage their compliance program. In a fully outsourced arrangement, we designate an experienced Confluence consultant as your firm's CCO, taking responsibility for the entire compliance program on an ongoing, interim, or short-term basis.



Code of Ethics

Managing your firm's code of ethics program can be tedious and time-consuming. We manage the process to ensure completion of all required reports and attestations.

Electronic Communications

Monitoring your firm's communications is necessary to identify potential conflicts, improper information sharing, or other issues. We conduct surveillance of electronic communications, such as email and social media, looking for activity that may indicate a problem.

Marketing

Firms are subject to particular requirements when conducting marketing and advertising activities. Our experts can review your materials to ensure your firm complies with current rules.

Regulatory Filings

Maintaining complete and accurate regulatory filings is critical to any registrant's responsibilities. We can also customize your regulatory filing services to address your firm's specific requirements. Our expertise encompasses Form ADV, Form CRS, Form PF, Form BD, Forms U4 and U5, and filings under Section 13 of the Exchange Act.

Third-Party Due Diligence

Firms are required to conduct third-party due diligence on their vendors. We provide customized policies and procedures, assess risk, and test for adherence to firm policies and regulatory concerns.

Trade Analytics

Reviewing trade activity is essential to evaluating whether activities are conducted fairly on behalf of all your clients. Our proprietary software analyzes your trading data for potential lapses in your controls.

Training

We provide periodic training to your firm on critical compliance topics to ensure that awareness remains high. This includes annual compliance training, training for new regulatory requirements and new firm policies, and training for new employees.

New Registrations

We help you navigate every step of the complex processes and requirements of registering with the SEC, FINRA, and individual states. For FINRA registrations, we cover all business models, including placement agents, capital acquisition brokers or limited purpose broker-dealers, and full-service broker-dealers, as well as continuing membership applications to address material changes to your firm's business. As your business grows, our compliance experts are there to help you scale according to your strategic compliance plan.

- ✓ Registration with regulatory bodies – including appropriate state registration and notice
- ✓ Preparation of Form ADV, Parts 1 and 2, and Form CRS, Form BD, and Form 7-R
- ✓ Registration of principals, officers, and individual reps, as needed
- ✓ Preparation of all regulatory documentation
- ✓ Drafting of code of ethics, insider trading policies, and compliance manuals
- ✓ Developing your compliance program
- ✓ Delivering training
- ✓ Exempt Reporting Adviser (ERA) filings
- ✓ "Promoter Only" Registrations

Compliance Manager

Our web-based Compliance Manager platform serves as the hub of your compliance program by:

- ▶ Housing your policies and procedures, code of ethics, and other essential documents
- ▶ Enabling employee attestations and checklists
- ▶ Tracking the progress of your ongoing compliance activities and broker feeds
- ▶ Keeping you updated through our compliance alerts

The risk assessment tool gives you a view of your critical risks with links to crucial procedures.

Cybersecurity

Confluence helps firms understand cybersecurity risks from regulatory, business, and operational perspectives. From implementing and maintaining cyber and business continuity policies and procedures required by the rules to performing testing, conducting security awareness training, and assessing your current program or building a complete cyber program, our cybersecurity experts will design or adapt your program based on your firm's needs and growth stage.

Consulting

- ▶ Policy development
- ▶ ISP program assessment
- ▶ Cyber-related compliance program review
- ▶ Training

Testing

- ▶ Vulnerability scanning
- ▶ Penetration testing
- ▶ Phishing

Monitoring

- ▶ Dark web monitoring
- ▶ Domain name squatting



"We were very pleased with Confluence prior to our SEC registration. They were able to answer all our questions, educate us on topics we weren't aware of, and compose our compliance program from A-Z, as well as aid with the ongoing evolution of our compliance program. Their guidance has been invaluable as we entered the RIA space from many years in the broker-dealer world. Coordinating with them on projects and tasks is always a pleasure, and we look forward to continuing our relationship with them. I would certainly recommend them to anyone looking to start an RIA firm."

– Managing Principal and Founder

THE
LEWIS FINANCIAL GROUP
PRIVATE WEALTH MANAGEMENT

To book a strategy meeting with our team,
email us at **info@confluence.com** or visit us at **confluence.com**

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