

Policies & Procedures

FAQ Sheet

What is Policies & Procedures?

Created by Wolters Kluwer Financial Services, Policies & Procedures is a Web-based application designed to enhance the foundation of any compliance program by automating the creation, publishing, distribution and updating of a firm's policies and procedures.

Integrating Wolters Kluwer Financial Services' unrivaled expertise, in-depth regulatory coverage and proprietary content, Policies & Procedures delivers a wide range of resources in a single, manageable online platform.

The primary policies and procedures rules that govern financial services companies include:

- **NASD Rule 3010 (b) (1)** — for broker-dealers
- **SEC '40 Act 206(4)-7(a)** — for investment advisor firms
- **SEC '40 Act 203(b)(3)-1** — for hedge fund advisors

To better help these firms meet their specific compliance needs, Policies & Procedures is available in three specialized versions:

Policies & Procedures for Broker Dealers—created for broker-dealers

Policies & Procedures for Investment Advisors—created for investment advisors

Policies & Procedures for Hedge Funds—created for hedge fund firms

What advantages does Policies & Procedures give to compliance professionals?

Policies & Procedures Wizard software

- Provides the most comprehensive set of written procedures available
- Fully customizable—not boilerplate content
- Widest scope of content on the market, covering SEC, NASD, NYSE, MSRB, USA Patriot Act and much more

Content management

- Online editing, publishing and distribution
- Hosting of firm's existing content
- Repository of archived manuals

Expert content—created by recognized authorities in securities compliance

Timely periodic updates—to ensure continued compliance by your firm

User administrative function—to manage and track user access

Forms/Appendix

- Standard compliance forms for all three industries
- Ability to customize, upload and integrate forms with manuals

Newsletter and Calendar

Training and Customer Support

Who are the authors?

Joan Lavell wrote the content for Policies & Procedures for Broker Dealers. Ms. Lavell has more than 30 years of experience in the securities industry, including sales of branch management. She has spent 25 years in the securities compliance field. She has served as Director of Compliance for PaineWebber, Inc., as well as major regional securities firms. She has been registered as a supervisor in numerous capacities, including NYSE Branch Manager, NYSE Compliance Official, NASD General Securities Principal, MSRB Principal and CBOE/AMEX Registered Options Principal. Ms. Lavell has also served on numerous committees of the NASD, NYSE, MSRB and the Securities Industry Association (SIA).

Bibb Strench wrote the content for both Policies & Procedures for Investment Advisors and Hedge Funds. Mr. Strench is a partner at the Washington, D.C. office of a leading investment management law firm. He has represented several of the nation's largest mutual fund complexes and investment advisers before federal and state court, the SEC and various state securities commissions. He is a former corporate counsel and member of the management committee of SAFECO Asset Management Company. Mr. Strench began his career at the Securities and Exchange Commission, where he was a member of the staff responsible for regulating investment advisers. Mr. Strench frequently speaks and lectures on issues surrounding investment management and securities regulation for the Investment Company Institute, National Society of Compliance Professionals and Investment Counsel Association of America. He has written numerous articles on investment advisor compliance issues and currently serves on the Board of Editors of one of the leading investment advisory compliance publications. In addition, he is a member of the Securities Advisory Board of the Department of Insurance and Regulation of the District of Columbia. Mr. Strench holds a B.A. degree from Vanderbilt University and J.D. degree from University of Virginia School of Law.

Who will benefit from using Policies & Procedures?

Anyone with compliance responsibilities will find Policies & Procedures to be an essential application. They include chief compliance officers, directors of compliance and compliance managers in:

- Investment advisor firms
- Broker-dealer firms
- Hedge fund firms

How does compliance fit into the responsibilities of these individuals?

Most financial services firms hire compliance personnel to oversee and manage the compliance issues within their organizations. The responsibilities of the compliance position often include:

- Leading enterprise compliance efforts
- Designing and implementing internal controls
- Creating and implementing policies and procedures to assure compliance with applicable local, state and federal laws and regulations, as well as guidelines from other third parties (i.e., NASD and NYSE)
- Managing audits and investigations into securities regulatory and compliance issues
- Responding to requests for information from regulatory bodies

How can Policies & Procedures help these individuals?

With Policies & Procedures, compliance professionals can comply with NASD, NYSE, MSRB and SEC regulatory rules, which helps them to organize and maintain various rules such as AML, supervisory controls, business continuity plans, conflict of interests and sales practices, among other topics.

Using Policies & Procedures, they can easily customize and apply firm-specific information and then edit, publish and disseminate the information to firm associates. Also, the Policies & Procedures products provide updates on the latest rules and regulations changes so that adjustments can be implemented in a timely, proactive manner.

How does Policies & Procedures solve the problems financial services firms face?

Problems	Solutions
Poor or substandard internal controls and poorly written procedures can lead to costly civil actions and damage to a firm's reputation.	Policies & Procedures helps compliance professionals and their firms organize and maintain manuals in a powerful, web-based platform—enhancing the foundation of their compliance program.
In the event of a compliance problem, regulators and examiners usually review a firm's policies and procedures to determine if adequate procedures were in place and responsibility for them.	Policies & Procedures' online setup wizard guides you to properly customize the manual according to your firm's specific need as well as providing historical archives of previous editions your manual.
Compliance professionals have a difficult time keeping up with rule changes issued by government and regulatory bodies.	Policies & Procedures provides frequent updates and communicates them via email and newsletters.
Compliance professionals would like to manage the accessibility of their policies and procedures by key employees, and to manage their usage of them.	Policies & Procedures includes a powerful user administrative tool that gives compliance professionals the ability to manage and track user access.

How quickly can Policies & Procedures be activated?

Activation times vary, but on average it usually takes 24 to 48 hours from time of order. Any special customizations a firm requests would lengthen the activation process.

How much does Policies & Procedures cost?

Policies & Procedures pricing is based on the size of your firm and the product version your firm requires. We invite you to speak with your sales representative.

Is product training available?

Yes. We will schedule training with you after your order and supply your firm with support materials.

Is product and technical support available?

Yes—via email and over the phone.

Email (based on product)

Policies + Procedures for Broker Dealers users: wspinfo@wolterskluwer.com

Policies + Procedures for Investment Advisors users: iaminfo@wolterskluwer.com

Policies + Procedures for Hedge Funds users: hfminfo@wolterskluwer.com

Call: **800-344-3734**

Keep your operations in compliance. Subscribe to Policies & Procedures.

Call your sales representative: **0800 840 1160**