



## Silver Makes a Culture of Compliance Realistic

Today, investment firm compliance best practices call for ample resources and independent input. Both regulators and investors expect continual dedication of resources to compliance and third-party testing. Silver clients are investment firms contemplating SEC investment adviser registration and registrants outsourcing ongoing compliance functions. We also advise investment firms in need of SEC exam support or looking for a fresh set of eyes to test their compliance programs.

### Registration and Foundation Services

- Regulatory risk review
- Draft and file Form ADV
- Customized, relevant Compliance Manual, Code of Ethics and related policies and procedures
- Compliance calendar tailored to the firm's compliance program and business practices
- Marketing material, website and social media review
- Initial staff training session

### Compliance Assessment Services

- SEC Preparedness Reviews test document production and prepare firms for regulator interview
- Mock SEC Exams probe, like regulators, for compliance and operational weaknesses
- Forensic testing analyzes specific firm practices such as expense or investment allocation, best execution, marketing and inside information practices
- Findings Implementation effects recommendations made by Silver or another company
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Silver prepares investment firms for success under regulator examination and investor due diligence. We combine multi-faceted industry expertise and innovation savvy to align firm processes with regulator and investor expectations without creating unmanageable complexity. Silver's customized guidance of private equity, venture capital, hedge fund and crypto/digital asset firms reflects each client's size, strategy and culture.

### Ongoing Maintenance Services

- Continuous regulatory risk and compliance program review
- Compliance calendar management
- Updates to Form ADV, Form CRS, Form PF and other regulatory filings
- Updates to Compliance Manual, Code of Ethics and related policies and procedures
- Employee Code of Ethics disclosure review
- Marketing material, investor communication, website and social media review
- Annual Review, including testing, a findings report and recommendation implementation
- Annual, new employee and thematic trainings
- Regular deadline reminders and updates on new industry and regulatory developments

### Exam Support Services

- Prepare firms for regulator exam process and interviews
- Lead initial document and follow-on request production
- Develop deficiency letter responses and any resulting disclosures, policies or procedures

