Developing an Effective Compliance Program

1. Prepare an inventory of current compliance risks and practices,
2. Create an independent Compliance Officer who reports to the Chief Executive Officer and the Board, or to a committee thereof,
3. Provide sufficient funding for the administration of compliance programs by the Compliance Officer,

4. Promote compliance by identifying measurable performance targets,
5. Tie regulatory compliance to personnel assessments and compensation, including compensation of management,
6. Providing for disciplinary consequences for infractions of Commission requirements,
7. Provide frequent mandatory training programs, including relevant "real world" examples and a list of prohibited activities,
8. Implement an internal Hotline through which personnel may anonymously report suspected compliance issues, and
9. Implement a comprehensive compliance audit program, including the tracking and review of any incidents of noncompliance, with submission of the results to senior management and the Board.

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