

Foreside provides comprehensive and tailored compliance services to Commodity Pool Operators (CPOs) and other National Futures Association (NFA)-registered entities. Our services span a broad spectrum, including assisting our clients in meeting NFA and Commodity Futures Trading Commission (CFTC) regulatory standards to ensuring that they are apprised of industry best practices. Foreside employs seasoned compliance professionals and attorneys who have worked extensively with NFA-registered firms in the Alternative and Registered Investment Funds environment.

Foreside's CPO services are generally offered in three stages, shown below. We will also accommodate other service models to meet the needs of clients and business partners in this space.

Development of a CPO Compliance Program

We will work with your firm to develop Written Supervisory Procedures (WSPs) and a customized Compliance Program Risk and Organizational Matrix for each of your commodity pools.

If you have an existing compliance program that requires modification to incorporate rules and regulations of a CPO, we will conduct a gap analysis aimed at leveraging your firm's existing policies and procedures. This will allow you to administer a robust compliance program while avoiding the costly, fixed expenses associated with hiring in-house compliance specialists and attorneys.

Our CPO Services Clients

We work with CPOs operating as stand-alone entities and those within complexes alongside other NFA-registered entities such as:

- Commodity Trading Advisers (CTAs)
- Introducing Brokers (IBs)
- Futures Commission Merchants (FCMs)


Compliance Program Training and Education

We will train your personnel on the requirements of the Compliance Program and the regulatory framework of CPOs, providing insight concerning NFA inspection preparedness.

On-Going CPO Compliance Consulting

We will assist you with your specific compliance needs, including each CPO's annual & quarterly NFA obligations, in addition to:

- Annual questionnaires and registration updates
- Self-examination checklists
- Business continuity reviews
- Ethics training sessions, led by our professionals and tailored to your firm's operating environment
- Quarterly CPO filings
- Financial statement filings
- Mock NFA examinations



Our integrity.
Our guidance.
Your success.

Emerging Developments Likely to Impact Registered Investment Companies

We will also partner with registered investment company clients and prospects in developing and maintaining NFA Compliance Programs that leverage existing Rule 38a-1 programs. We provide uniquely tailored gap analyses accompanied by the education required to empower and augment current in-house personnel to supervise, oversee and demonstrate a sound NFA compliance Program, thus aiding firms in avoiding the expense of hiring additional compliance staff seasoned in the area of NFA/CFTC compliance.

Discover the Foreside Difference

Precision, expertise and integrity, combined with professional insight, position Foreside to offer cost-effective solutions. Our service models allow our clients to focus principally on the core competence of managing money, with the peace of mind that they have outsourced critical ancillary matters, such as distribution and compliance, to those who have developed core competencies in those areas.

Interested in learning more?

Visit our website, www.foreside.com, or contact Julie Walsh, Managing Director, Compliance Services, at 617.224.0723 (jwalsh@foreside.com) or Susan Mosher, Business Head, Compliance Services, at 207.553.1953 (smosher@foreside.com).