

# Cognitive GRC Template Services

Policies and procedures are an essential part of a firm, reflecting values and providing guidance in daily operations. They ensure compliance with laws and regulations and streamline internal processes.

The key to having appropriate procedures is to understand that the nuance skill is to provide sufficient level of controls to mitigate or address the risk without overburdening the resources to being able to comply with them. By having well tested policies and procedures that have been continuously improved over time against risk factors, and not just the expectations of one regulator, we believe our core products deliver the goldilocks formula of satisfying the fit for purpose criteria. In some respect, they challenge the regulatory expectations but in other they may go beyond to address what we see as either investor or operational enhancements that ultimately reduce overall energy expended.

- Compliance Manual
- Policies and Procedures Manual
- Forms Manual

General	Licensing / Notifications / Complaints / Outsourcing / Personnel
Conflicts	Management / Gifts and Entertainment / PA Dealing / Side Letters / Outside Activities
Marketing	AML / Client Take On / Marketing Funds / Investor Categorisation
Accounting	Annual Reporting / FRR Reporting / Financial Resources
Investment	Best Execution and Broker Review / Churning / Record Keeping / Aggregation and Allocation / Dealing Commissions / Trade and Transaction Monitoring / HK Long and Short Selling Disclosures / Research Services / Investment Risk / Investment Process / Market Misconduct / ESG/ Climate / Artificial Intelligence / Machine Learning
Operations	Valuation / Custody / Client Disclosure / Data (Location) / Counterparty Risk / Errors / Breaches / Electronic Data and Record Keeping / Service Provider Management / Operational Resilience
Internal Control	Apportionment and Segregation / Data Security / Business Risk Management / Business Continuity / Compliance Arrangements / Cybersecurity / Fraud Prevention / Operational Resilience / Management and Internal Control / Exit Plan

## About Cognitive GRC

We are a Hong Kong provider of governance, risk and compliance advisory services and a partner to our clients working together to mitigate the regulatory, operational, and reputational risks associated with their regulatory activities. We work with Hong Kong, Chinese, US and European firms on local, inbound and outbound regulatory matters. We have been successfully advising international regulated firms since 2005.

- At the forefront of regulatory change in three major jurisdictions and experience with multiple regulators.
- 20 years of consulting experience baked into our robust working documents, standards of care and service (FCA, SEC, CFTC, NFA, SFC plus).
- Continual consistent improvement in technical support and servicing based on delivering to hundreds of firms with similar needs.

We are an independently owned institutional style consulting firm matched to boutique partner led businesses. This means:

- Unlike large corporate service providers, we have a team dedicated to offering the solutions that address your specific needs. We are independently owned; investing back in the company and people to provide consistent service. We are dedicated to service standard over growth objectives.
- We combine the agility and personalised attention of a boutique firm with the experience, resources and reach of an institutionally experienced firm.
- We provide real solutions that allow you to get on with your core competence and avoid the administrative pitfalls that beset most firms.

## Contact

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