Annual Review of Compliance Policies & Procedures

Rule 206(4)-7 / Rule 38a-1 — Sample Report Generated by RegReview

Firm: Acme Capital Advisors, LLC **CRD:** 000000 **Review Period:** Jan 1 – Dec 31, 2025

Reviewer: Jane Smith, Chief Compliance Officer **Report Date:** Feb 14, 2026

1. Executive Summary

This Annual Review evaluates the adequacy and effectiveness of Acme Capital Advisors' compliance program for the year ended December 31, 2025, in accordance with Rule 206(4)-7 of the Investment Advisers Act of 1940. RegReview auto-aggregated all compliance tasks, marketing reviews, audit findings, and registration activity from the platform over the review period and scored each program area against current SEC and State examination priorities.

Overall Program Rating: **Effective with Minor Enhancements Recommended**. 3 high-severity findings remediated during the year; 2 medium findings open and tracked.

2. Risk Assessment Summary

Program Area	Risk Rating	Findings	Status
Marketing Rule (Rule 206(4)-1)	Medium	2	Remediated
Code of Ethics & Personal Trading	Low	0	Effective
Custody (Rule 206(4)-2)	Low	0	Effective
Books & Records (Rule 204-2)	Medium	1	Open — Q1 2026
Form ADV / State Notice Filings	Low	1	Remediated
Cybersecurity & Vendor DD	High	3	Remediated
Business Continuity (Reg S-ID/S-P)	Medium	1	Open — Q2 2026
Trading & Best Execution	Low	0	Effective

3. Testing Performed

• **Marketing Rule:** Reviewed 47 marketing pieces submitted via RegReview's Marketing Review module. ADScanner ran multi-regulator checks (SEC, FINRA 2210) on each. 2 testimonial disclosures required remediation.

• **Code of Ethics:** Reconciled 100% of access-person personal trading reports to broker statements via RegReview's automated attestation workflow.

• **Books & Records:** Sampled 30 client files; 1 missing advisory agreement remediated within 5 days.

• **Cybersecurity:** Vendor DD refreshed for 12 critical vendors; phishing test results reviewed; 3 medium findings closed.

• **Form ADV:** Annual amendment filed 03/29/2025 (timely). State notice filings reconciled across 14 states.

4. Findings & Remediation

#	Finding	Severity	Remediation	Owner	Due
F-01	Two testimonials missing required disclosures	Med	Disclosures added; advertising policy updated	Marketing	Closed 06/12/25
F-02	Vendor SOC 2 reports >12 months old (3 vendors)	High	Refresh requested; vendor matrix updated	CCO	Closed 09/30/25
F-03	Client agreement missing for one rollover account	Med	Agreement obtained; intake checklist updated	Ops	Closed 04/15/25
F-04	BCP tabletop test not formally documented	Med	Documentation template added; next test 04/2026	CCO	Open Q2 2026
F-05	WISP missing AI tool inventory section	Med	Update drafted; pending board approval	CCO/IT	Open Q1 2026

5. Recommendations for 2026

• Adopt AI governance policy covering use of generative AI in client communications and research (track via RegReview policy library).

• Expand vendor due diligence cadence from annual to semi-annual for vendors processing PII.

• Conduct mock SEC examination in Q3 2026 using RegReview's Audit Prep module.

• Complete formal BCP tabletop test and document via Continuity Hub.

6. CCO Certification

I, Jane Smith, Chief Compliance Officer of Acme Capital Advisors, LLC, hereby certify that I have conducted this annual review of the firm's compliance policies and procedures in accordance with Rule 206(4)-7 and have determined the program to be reasonably designed to prevent violations of the Advisers Act and the rules thereunder, subject to the remediation items noted above.

______________________________________ Date: ____________

Jane Smith, CCO