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Introduction

Financial regulatory compliance has never been more demanding.

Cosegic appreciates that increasing regulatory requirements often go hand in hand with an increased workload and cost to the businesses they impact.

The ever-evolving regulatory landscape prompted us to create a user-friendly, effortless way to assist its clients in meeting their compliance obligations. We believe that PortALL represents the future of regulatory compliance.

The PortALL Application ('App') is hosted on SharePoint utilising Microsoft's Azure Servers and accessible on all operating systems via an internet browser. Utilising SharePoint as the basis for our new system means that the App will integrate with firms existing systems, be in a familiar form for most users, ensures the IT infrastructure is the most up to date and innovative, and guarantees that your data is held in a highly secure environment. As an app-based compliance solution you can manage your regulatory obligations anytime, anywhere. Our vision is that firms will be able to slash the time spent on menial compliance tasks and admin whilst improving compliant practices.



PortALL

Benefits of PortALL

The key features of PortALL are summarised below.



Client dashboard

- Your Firm's Compliance Officer will have access to a live dashboard of your Firm's compliance activities, including;
 - o Regulatory filings calendar and alerts;
 - o Personal trading disclosure and approval;
 - o Gifts and entertainment disclosure and approval;
 - o Outside business interests disclosure and approval;
 - o Personal conflicts of interest disclosure and approval; and
 - o Policy/procedure review and approval.



Regulatory filings

- Automated diary of your Firm's regulatory filings and reporting to the FCA, including reminders of due dates; and
- Electronic audit trail of previous filings.



Training

- Access to Cosegic's e-learning materials and learning management system ('LMS');
- The LMS is a powerful tool which allows the allocation of compliance training to employees at the appropriate level (support staff vs front office staff), tracks which employees have completed their training, whether they passed the course and flags employees who have not met training deadlines.
- Training is allocated automatically by the system based on an individual's role within the Firm.



Policies and procedures

- Central repository of your Firm's most up to date, documented compliance policies and procedures;
- Documents are revised by us as necessary and automatically updated on PortALL, with an audit trail of previous versions; and
- The latest documents are automatically available to relevant employees, with the system automatically filtering the materials available based on job role.



Benefits of PortALL

Employee attestations and disclosures



- Your Firm's Compliance Officer can create and issue attestation requests to relevant employees.
- Once created, attestations will run automatically in line with the frequency selected and can be circulated to all employees or those in a specific role.
- The completion status of all attestations and disclosures can be monitored centrally.
- Delayed responses result in automatic reminders being issued to the relevant individuals by the system and will escalate the issue automatically should these reminders be disregarded.
- Employees submit personal account dealing, gifts and entertainment, outside business interest and conflict disclosures directly into the system for review and approval by the Compliance Officer.

Regulatory updates



- Compliance Officer area contains real time newsletters and updates as well as a link into the FCA website.

Reporting MI



- PortALL can provide real time MI so that your Compliance Officer can monitor employee compliance actions and declarations, providing Board and Executive Committee assurance.

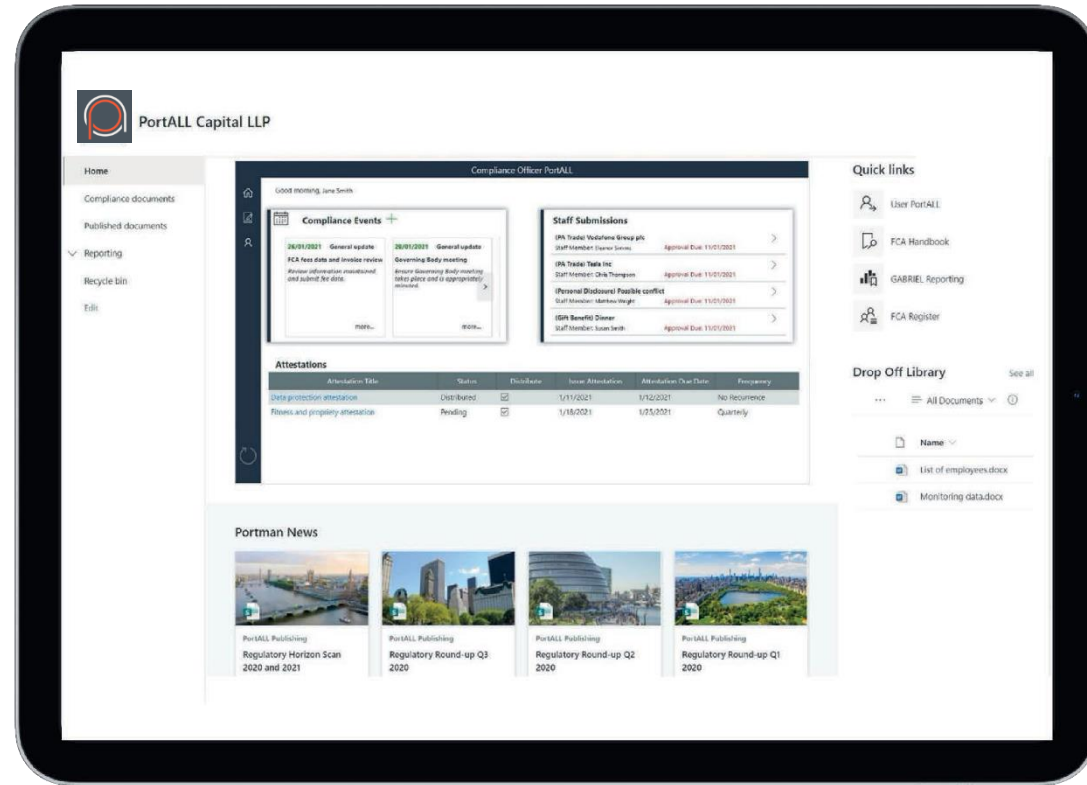


How does PortALL work?

The PortALL App is designed to enhance and simplify your business compliance processes. Put plainly it will streamline data exchange between Compliance Officer and employee; client and Compliance Consultant as well as enhance the central monitoring of your compliance processes.

Your Cosegic consultant will have access to the 'Consultant Hub' of PortALL which allows them to access your bespoke PortALL sites containing information relevant to your business. As the information is live, this reduces the amount of time your employees will need to spend providing this information manually for compliance reviews/reports.

As a client, you will have your own secure 'Client Hub' which, again, is specific to your Firm and contains two distinct sites. Your firm's compliance officer will have access to the full Client Hub which includes full access to all client related information contained within PortALL as well as regulatory updates posted centrally by our team.

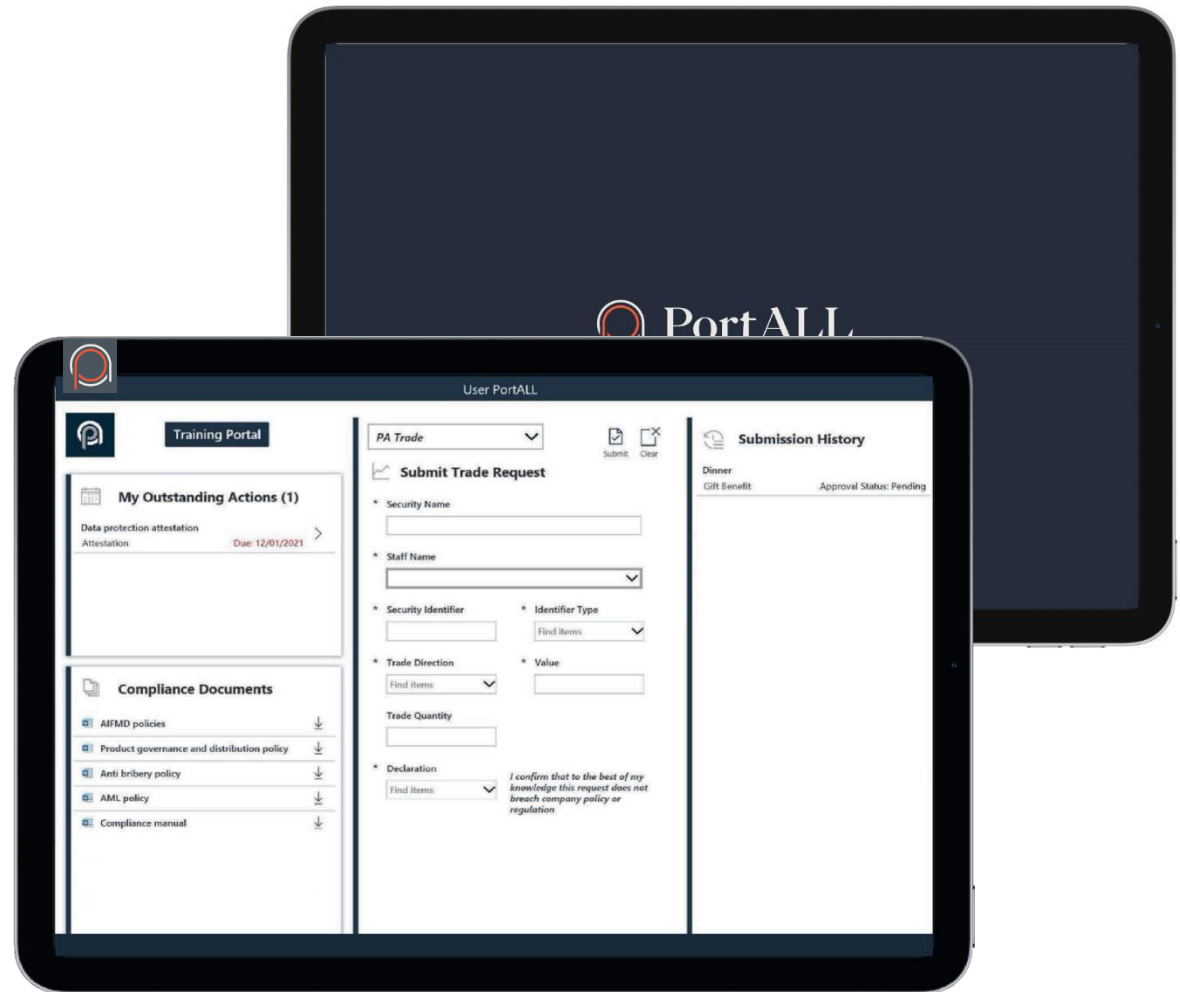


Compliance Officer homepage



How does PortALL work?

Compliance Officers can then grant access to other users within your Firm to the secondary secure application. This second site enables employees to submit and receive approval for regulatory disclosures such as Gifts received or given, or personal trading disclosures. Employees can also download published compliance documents such as Compliance Manuals and Policies as well as respond electronically to attestations issued to them by their Compliance Officer.



User homepage



How does PortALL work?

Workflow



Workflows automatically manage the disclosure/approval process between an employee and the client's Compliance Officers ensuring there are robust audit trails, and everyone is kept informed. There are additional workflows to manage the issuing and tracking of employee attestations. Reminders are sent to employees if attestations remain open and when the process is complete, the next attestation is automatically scheduled based on a predefined frequency.

The workflow automatically issues employees with relevant training and presents the Firm's Compliance Officer with feedback on user performance. The system will present the Compliance Officer with the most important information (i.e. failed training) which will enable the Compliance Officer to take steps to resolve a flagged issue or focus on other areas. Management information can be collated and presented as part of a monitoring audit trail.



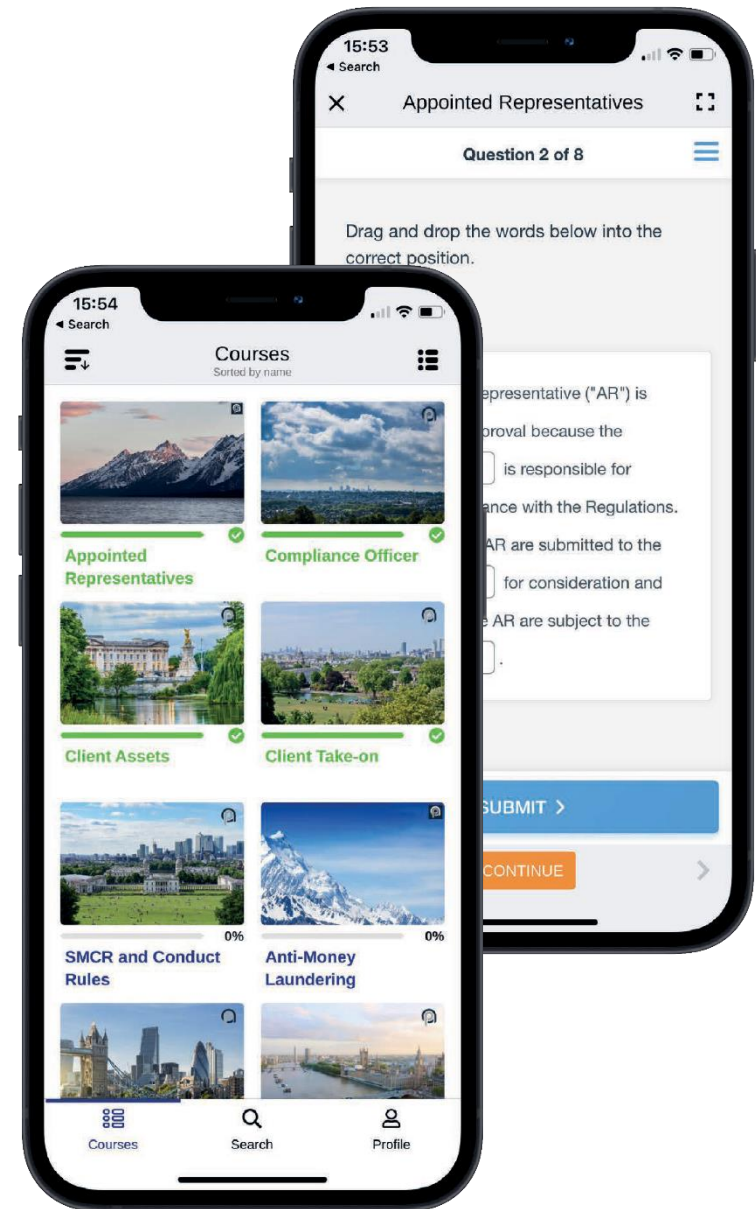
How does PortAll work?



Compliance Training and Learning Management System

PortALL also includes an e-learning compliance solution that issues users with tailored compliance training based on the regulated status of their Firm and their individual employee role/responsibilities. This avoids the need for all your employees to sit through time consuming and inflexible class-based learning every year.

The e-learning can be set at the appropriate level for different employees and can be completed on your own time frame. Crucially, PortALL monitors who has completed their compliance training (and successfully answered questions), maintaining an audit trail and issuing reminder alerts as necessary.



PortALL Security

The security and integrity of your confidential data is the most important aspect of any technology solution. PortALL has been designed and built with security as the cornerstone of the system.

PortALL leverages Microsoft SharePoint and the Azure server network to host, maintain and manage your data. This means that your information is physically secure, with Microsoft maintaining round the clock security at its data centres, and digitally secure, with information stored on drives encrypted using BitLocker encryption (i.e., encryption at rest) and accessed through HTTPS.

The PortALL system benefits from multiple layers of redundancy, with backups of information maintained at datacentre level and available to fully restore as system should it be required.

Data is maintained in United Kingdom based data centres and will continue to belong to you throughout your use of the system. Additionally, data can be exported (as Excel data sheets) ensuring your data is accessible and maintainable whatever happens.



Pricing Plan

We want as many of our clients as possible to benefit from using PortALL as part of their compliance programme, while recognising that it cannot entirely replace the experience and expertise of our compliance consultants.

Full Site

For the use of the full PortALL site there is an initial set up fee of £2,000 (if you have less than 25 users this fee is reduced to £1,000) where you will work with your consultant to tailor the system to your needs. Ongoing portal fees are displayed to the right.

E-Learning Only (PortALL branded)

For the use of the Learning Management System only there is a charge of £120 per user per annum.

E-Learning Only (Branded for your firm)







For the creation of your own tailored site there is an initial set up fee of £1000. This price includes a bespoke and branded environment complete with your own colour scheme and images from your website. All users will be £120 per user per annum.

Full Site

One off set up fee £2,000

Number of users

Fee

Up to 5 users		£700 per quarter
Up to 10 users		£1,300 per quarter
Up to 15 users		£1,900 per quarter
Up to 20 users		£2,500 per quarter
Up to 25 users		£3,100 per quarter
26 users or more		Contact us for a quote
E-Learning Only		
Branded site		£1,000 one-off set up fee
E-Learning only		£120 per user per annum





Contact Us

portall@cosegic.com

020 7060 4499