

Volcker Compliance Portal

The Volcker Rule's prohibitions on proprietary trading and private fund activities pose major compliance challenges to banking entities, affecting multiple business lines and control units.

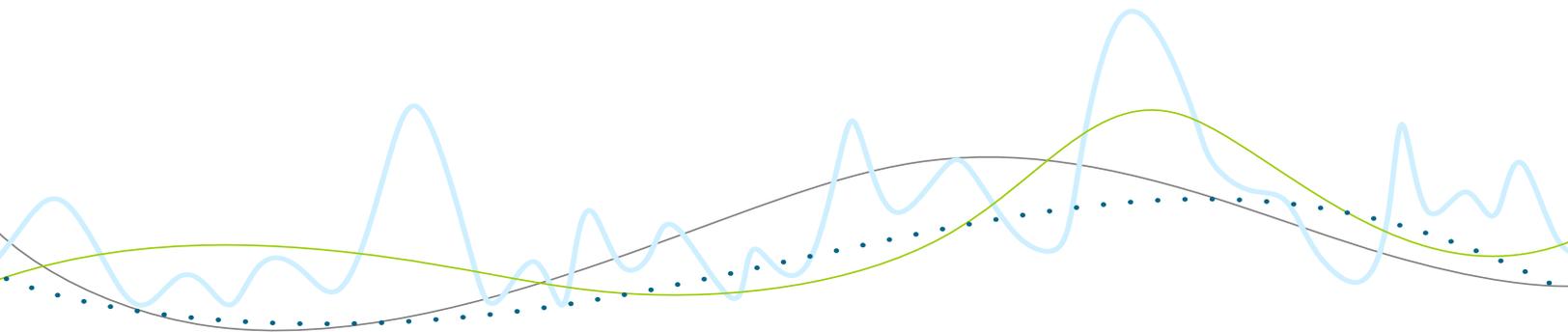
The **Davis Polk Volcker Team** is uniquely positioned to:

- Assist in the identification and analysis of issues particular to your institution under the Volcker Rule;
- Draft policies and procedures for compliance with the rule; and
- Advise and assist with the implementation of a compliance program.

Volcker Diagnostic & Assessment

Our approach includes:

- **Intelligent Information Collection:** Using web-based questionnaires and data collection tools developed by Davis Polk to identify prohibited trading activities and covered fund relationships and investments throughout the enterprise and gather key data and documentation in a single, secure database;
- **Analysis:** Working with banking entity personnel and financial consultants to develop assessments of likely conformance issues; and
- **Strategy and Implementation:** Working with banking entity personnel and financial consultants to develop implementation work-plans and timelines.



Volcker Compliance Program

Our approach includes:

- **Program Architecture:** Developing a high-level, enterprise-wide Volcker compliance architecture;
- **High-level Policies:** Establishing high-level trading and funds policies on an enterprise-wide basis, as appropriate;
- **Granular Policies and Procedures:** Developing and implementing Volcker prop trading and funds policies and procedures at the business or desk-level, as appropriate; and
- **Implementation Assistance:** Continuing advice and support of internal compliance teams and implementation processes.

Volcker Communications & Training

Our approach includes:

- **Management Education:** Developing reports and memoranda for senior management and the board of directors regarding regulatory requirements, their responsibilities, plans for compliance and progress;
- **Training:** Providing enterprise-wide and business-specific training programs; and
- **External Outreach:** Developing disclosure materials to educate and update clients and investors.

Davis Polk's industry-leading Financial Institutions Group provides unparalleled capacity and experience to address these issues across all banking and securities businesses. Our track record of delivering implementation tools and informational products that leverage new technologies, in connection with other areas of the Dodd-Frank Act, shows our commitment and expertise across multiple disciplines and our understanding of the way our clients approach the new regulatory environment.

If you have questions regarding our approach to Volcker Rule compliance or would like to discuss how the Davis Polk Volcker Team may best assist you in your compliance efforts, please contact volcker@davispolk.com, or your regular Davis Polk contact.