

Disclaimer: *The following is a sample business communications compliance certification/attestation that is being provided to member firms of the Investment Adviser Association for informational purposes. Member firms should consider their individual situations before relying on the below certification/attestation. These materials may not be reproduced or disseminated without the permission of Willkie Farr & Gallagher LLP.*

Quarterly Certification of Business Communication Requirements

This will confirm and certify that:

1. You understand that [___] (the "Firm") is an investment adviser registered with the U.S. Securities and Exchange Commission under the Investment Advisers Act of 1940, and the Firm is required to maintain certain true, accurate, and current books and records.
2. You have read and understand the policies established by the Firm concerning the use of electronic devices and systems for communications (the "Policies"). You understand that the Policies require, among other things, the following:
[TAILOR THE FOLLOWING BASED ON THE ACTUAL POLICIES OF THE FIRM.]
 - a. *[The requirement that all **written or electronic business-related communications** must be transmitted and/or received only through approved means of communication.*
 - b. *The prohibition on using **text message communications** or other non-approved means of communication for business-related communications, unless such messages are archived, supervised and monitored by the Firm.]*
3. You and the staff that you supervise (if any) have been made aware of the Policies either by you, [Legal, Compliance, or Senior Management].
4. You are aware of your responsibilities, including if applicable, your responsibility to supervise the activities of others conducted within your area.
5. You are aware of your obligation to escalate breaches of the Policies and suspicious activities to [Legal, Compliance, or Senior Management].
6. To the best of your knowledge and belief, you and the staff that you supervise (if any) have acted in compliance with the Policies, applicable regulations and law. You are not presently aware of any violations of the Policies, applicable regulations or law except for violations that you have already reported to, or discussed with, [Legal, Compliance, or Senior Management].
7. To the best of your knowledge and belief, (a) you and the staff that you supervise (if any) do not have any written or electronic business-related communications on non-approved communication devices and systems (unless they were captured by a Firm-sponsored or approved application), that have not already been reported to, or discussed with, [Legal, Compliance, or Senior Management], and (b) if you and the staff that you supervise (if any) have written or electronic business-related communications on a device that were not also captured and stored on the Firm's systems, you are not deleting them until such time as those messages are captured and stored on the Firm's systems.

I hereby confirm and certify that I understand my responsibilities as an employee of the Firm and that I am in compliance with the requirements set out in this form.

Print Name: _____

Signature: _____

Date: _____