

## Comprehensive Compliance Program

In a world where threats to data security occur daily, keeping business data secure is no longer something businesses try to do, it is something they MUST do in order to compete in the global marketplace.

Protecting our client's Personally Identifying Information ("PII") and the privacy of health related information ("HIPAA") is a priority at Tucker Arensberg. We have established a Comprehensive Compliance Program ("CCP") within the firm to insure that all PII, HIPAA and client confidential information is being protected when the information is in our control.

The overall CCP is comprised of the following elements:

- Surveying the legal environment to identify areas of risk and then develop responsive policies and procedures;
- Conducting regular client focused compliance audits and risk assessments;
- Supporting the program with acceptance of the program at ALL levels of the firm;
- Maintaining written compliance materials, policies and procedures;
- Fostering a culture that embraces a dynamic approach to compliance;
- Developing and delivering education training for all employees;
- Monitoring the program and its implementation for future enhancements;
- Auditing adherence to the CCP and our policies and procedures both internally and with our key vendors;
- Undertaking appropriate investigations if non-compliance occurs;
- Having the CCP policies and procedures easily accessible to all.

The CCP features detailed policies and procedures that address day-to-day law firm operations, human resources, information technology, third party vendor management, visitation and access control. We are proud to have implemented our Clean Desk Policy which further enhances our ability to protect sensitive client information. We have also installed security cameras in our offices around areas such as the entrances and exits and file rooms, to ensure security.

Tucker Arensberg has dedicated substantial resources to this effort and we are committed to enhance our capabilities moving forward.

For additional information about the firm's Comprehensive Compliance Program, please contact our Chief Compliance Officer, Erin Beckner Conlin.