

**ProTracker Software, Inc.
Compliance Manual, Version 6
July 2011**

SUMMARY OF CHANGES BETWEEN VERSION 5 AND VERSION 6

Section	Section Title	Sub-Section	Change	Comment
TOC	Table of Contents	F. Regulatory	Changed title of Section F-02 to Form ADV Part 2 Firm Brochure	Required by conversion to narrative brochure in plain English
TOC	Table of Contents	G. Policies and Procedures	Added new Section G-11 Social Media	Acknowledge increased federal and state interest in use of social media
A-02	Code of Ethics	Client Awareness	Changed language to reference Form ADV Part 2 Firm Brochure	Updated
B-02	Advertisements	Supporting Manuals (new)	Added new sub-section to reference supporting manuals: Marketing Manual www.CompanyName.com Manual Website Document Archives Manual Advertising Archives Manual	Better cross referencing
D-03	Trading	Trades Generated Through Rebalancing Software	Added new sub-section to state the replacement of manually-generated <i>Trade Record</i> sheets with computer-generated <i>Trade Review</i> sheets	Reflects changes to daily operations due to the adoption of rebalancing software
D-03	Trading	Location	Added paragraph stating the location of the Investment Management Binders in the office	Reflects changes to daily operations
D-03	Trading	Record Retention	Changed trade record retention from “indefinitely” to “a minimum of five years”	Reduces record retention to reflect legal requirements

Section	Section Title	Sub-Section	Change	Comment
D-07	Custody	All	Completely replaced Version 5 and prior versions	New Custody Rule 206(4)-2 and new narrative Form ADV Part 2 Firm Brochure
F-01	Form ADV Part 1	All	Completely replaced Version 5 and prior versions	Reflects Dodd-Frank Act allowing SEC registration if AUM greater than \$100MM, and requiring state registration if AUM is less than \$100MM.
F-02	Form ADV Part 2	All	Completely replaced Version 5 and prior versions	Reflects Dodd-Frank Act and new requirements for a narrative brochure in plain English
F-07	Compliance Review	F-07-5 Spreadsheet	Added line for G-11 Social Media	New regulatory focus
G-05	Training & Testing Log		Added "Sheet ____" at bottom	Keep sheets in numerical order
G-06	Best Execution	Disclosure	Updated to reflect Form ADV Part 2 Firm Brochure	Reflects Dodd-Frank Act nomenclature
G-07	Soft Dollars	Account Aggregation	Removed references to Yodlee	Broadened words
G-07	Soft Dollars	Disclosure	Updated to reflect Form ADV Part 2 Firm Brochure	Reflects Dodd-Frank Act nomenclature
G-08	Proxy Voting	All	Modified template to allow for Company voting of proxies	Both a "vote proxies" stance and a "don't vote proxies" stance are included; choose one or the other
G-10	Information Security Program	Security Risks Considered	Under Technical (electronic) security risks, added "Failing to erase the hard drive in a copy machine before disposal"	Most copiers today have an internal hard drive that stores an image of all documents copied
G-10	Information Security Program	Copier Machine Disposal (new)	Added new sub-section after "Anti-virus Software	Define copier disposal requirements

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G-10	Information Security Program	Form 5 Information Security Program Training Log	Changed paragraph at top of form listing people trained (to be signed only by the Information Security Officer)	Clarified usage of Form 5
G-11	Social Media	Added new Section	New Section and Social Media Review Form	Acknowledge increased federal and state regulatory interest in use of social media and provide a mechanism to review social media usage within the firm
G-11	Social Media	N/A	Added PowerPoint presentation to facilitate training and discussion on social media policy	Each company must tailor their social media policy to reflect their own decisions