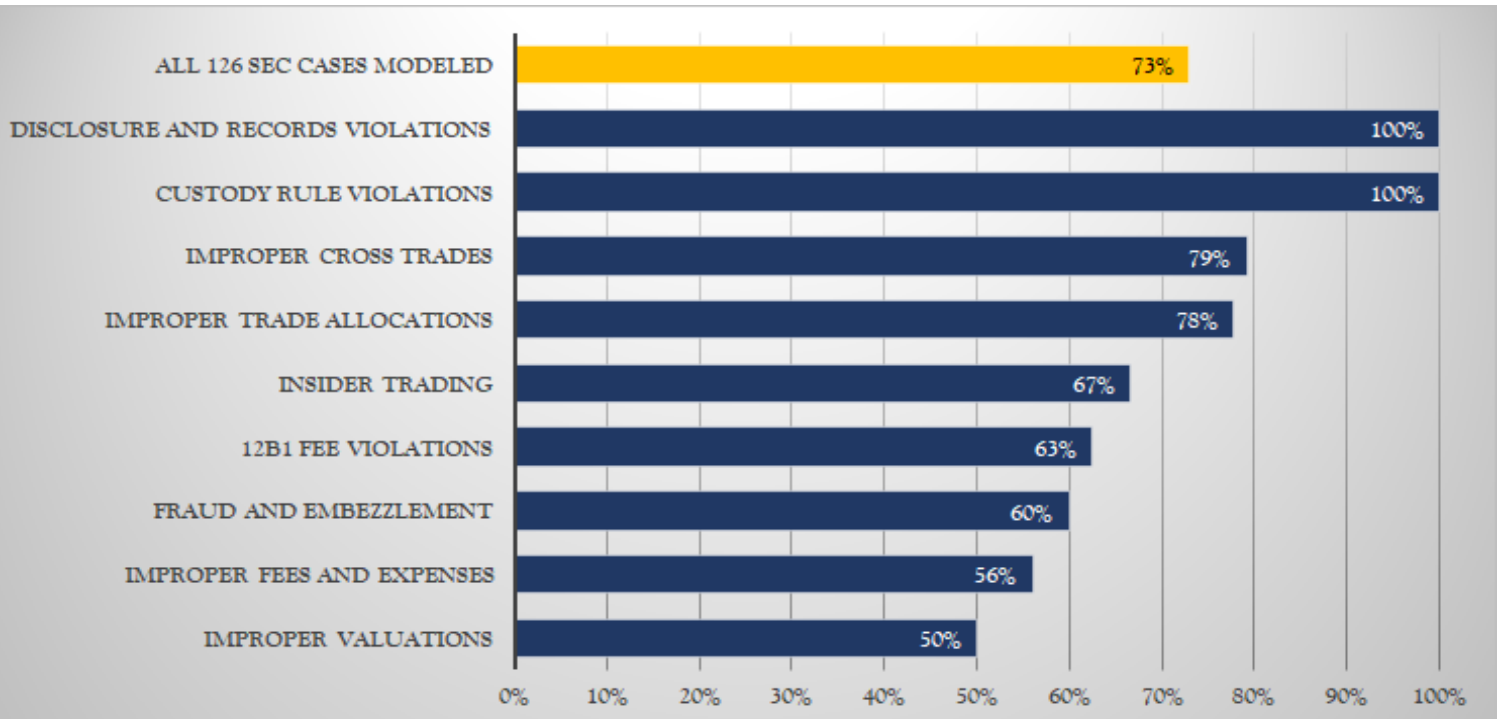


### Multiple Advisory Services

- Convergence's Multiple Advisory Services is a compliance risk factor that is considered high-risk when the Delegate carries on 3 or more different types of investment Advisory services. Multiple Advisory services are often provided to different forms of clients and carry different compensation types. This additional complexity requires the Delegate to incur greater levels of compliance and operational work to oversee the conflicts they may create and support what may be very different forms of work needed to support multiple types of clients.
- The graph below highlights the percentage of sampled SEC cases taken against registered investment advisers in the United States for various infractions where the Advisory Services factor was rated high-risk. The way to read the graph is, "In 73% of 126 SEC cases modeled by Convergence the Adviser had a high-risk Advisory Services factor in their business and the same high-risk condition existed in 100% of disclosure/record keeping cases and in 100% of custody rule violation cases."
- Designated persons should ask Delegates with a high-risk Advisory Service condition to disclose the Advisory services they provide, the conflicts between them and the controls in place to manage them.



The Convergence Database includes 4,000 data points on each Adviser/Manager updated daily, including:

- 38,000+ SEC and State Advisers
- 183,000+ private-public funds
- 6,000+ Service Providers
- 100,000+ C-Suite Executives
- 30+ Investment Strategies

For more information on the topic of "identifying and dealing with non-investment risk conditions" in your Delegates, please contact George Gainer at Convergence at [ggainer@convergenceinc.com](mailto:ggainer@convergenceinc.com)