

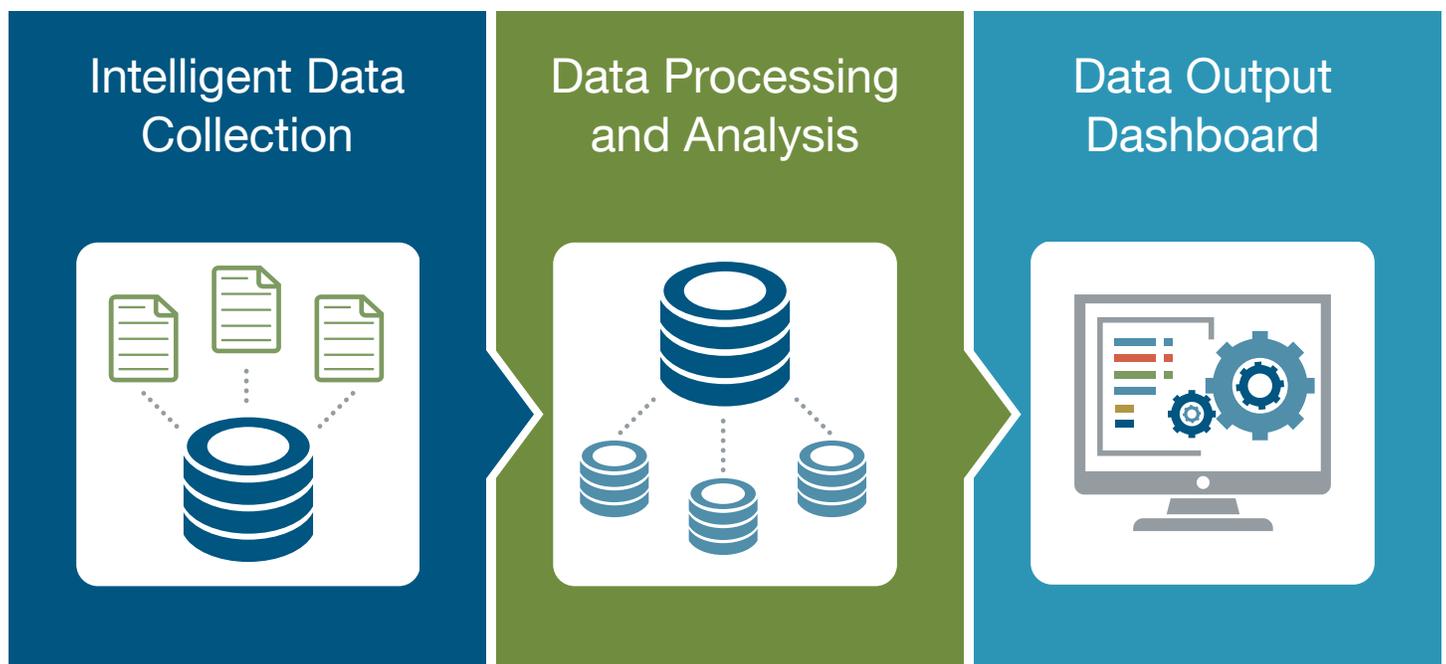
Davis Polk Volcker Portal

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

The **Volcker Portal** is a web-based tool uniquely designed to:

- Intelligently and efficiently collect data needed to identify and classify proprietary trading and covered fund and securitization activities in a single, secure database
- Organize, analyze and flag data to facilitate assessments of likely conformance issues
- Provide searchable data, reporting functionality, audit trails, and conformance progress tracking



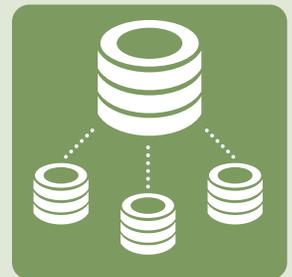
1 Intelligent Data Collection

- Plain language questions, including business-friendly explanations of key terms, synthesize difficult concepts; live help available for further assistance and clarification
- Efficient division of questions into those best answered at the desk level and those answered collectively by legal or compliance
- Document capture for consolidation of background documentation necessary for further analysis, audit and follow-up
- Continual refinements to reflect new interpretations and regulatory guidance
- Customized for individual firms, including pre-population of previously collected data



2 Data Processing and Analysis

- Categorization of data to facilitate compliance assessments
- Management-, legal- and compliance-level review and sign-off
- Audit trail of responses and progress
- Identification of red flags
- Process for systematic challenges to ensure data accuracy
- Equipping in-house personnel to update data and follow up with interviews or other outreach as needed with necessary background data already in hand



3 Data Output Dashboard

- Viewable and searchable data through web-based portal
- Export functionality to create reports, prepare regulatory responses as needed
- Tracking of conformance efforts



Please contact volcker.portal@davispolk.com for further information.