

Chief Compliance Officer of Fund Complex and Related Entities

Overview: Serve as Chief Compliance Officer (“CCO”) of \$3+ billion mutual fund complex (the “Funds”), as well as the Adviser and Administrator to the Funds and its affiliated Distributor (jointly the “Entities”), headquartered in New York City with satellite offices and service providers located throughout the U.S. Report to Presidents of the Entities and the Boards of Trustees of the Funds on potential compliance and risk related issues.

Desired Skills, Experience & Qualifications / Job Requirements:

- Working knowledge of applicable rules, regulations, and laws, including
 - the Advisers Act;
 - 1940 Act; and,
 - FINRA related rules and regulations
- Experience with portfolio management, trading, and shareholder accounting and reporting
- Familiarity with mutual fund, advisory, and broker-dealer financial statements and reporting
- Strong interpersonal and communications skills (writing and speaking)
- Resourcefulness
- Regular travel to meet with Boards of Trustees of the Funds, employees in satellite offices, and various service providers to the Funds
- Strong organizational skills and attention to detail
- Strong evaluative and analytical skills
- Capability to work independently, with limited support staff
- Strong skills and familiarity with respect to the MS Office, Windows, and various regulatory systems and programs
- Active status in good standing for various securities licenses (Series 24 or 26 and Series 65 or 66), or willingness to acquire such licenses within 90 days of joining the Entities

Initial Expectations:

- Review / comment upon existing policies and procedures, providing an outside perspective while seeking to ensure compliance with all applicable laws, regulations, and best practices related to compliance and risk management and recognizing that one size does not fit all
- Establish and maintain various procedures manuals
- Perform gap analysis of compliance with applicable laws, regulations, and best practices; determine desirability of new policies/procedures, while recognizing that one size does not fit all
- Establish schedule and processes for testing and documentation thereof of all existing and new policies and procedures with the goal to
 - ensure compliance with all policies, procedures, applicable rules, regulations, and laws
 - educate employees and ensure that they embrace a culture of compliance
- Reinforce / seek to maintain culture that embraces compliance and seeks to adhere to and perfect such compliance in spirit, rather than simply seeking to comply by law
- Conduct appropriate training for all new employees
- Establish continuing education / training schedule with goal to ensure that employees embrace culture of compliance
- Establish visitation schedule with employees and various service providers/business partners with goal to provide appropriate oversight and ensure strong communications, understanding and embracement of culture of compliance

Ongoing Expectations / Job Description:

- **Promote culture of proactive compliance and risk awareness**
 - Maintain open line of communication
 - Conduct ongoing training
 - Carefully manage multiple roles as Fund, Adviser and Broker-Dealer CCO
 - Work closely with Fund Counsel
 - Ensure appropriate allocation of compliance and risk-awareness resources

- **Implement, administer and oversee a comprehensive, robust and dynamic compliance and risk oversight program**
 - Develop, assist, or facilitate in the development and revision of policies, procedures and guidelines designed to facilitate compliance with applicable laws and regulations based on regular gap analysis
 - Ensure that compliance policies, procedures, and guidelines
 - properly reflect the Entities' business processes and potential conflicts of interest
 - are regularly reviewed, tested and current with respect to changes within the Entities and the regulatory environment
 - Review issues, trends, and regulatory changes, continually seeking to improve upon the effectiveness of the compliance and risk oversight program
 - Conduct regular regulatory risk assessment and identification of conflicts of interest
 - Maintain comprehensive compliance and risk oversight program, including compliance and risk matrices covering key regulatory and operational activities
 - Ensure timely and appropriate review of material and repetitive compliance issues as indicators of possible gaps and weaknesses in policies, procedures or risk identification processes and facilitate use of such information to keep compliance program evergreen

- **Regulatory relations**
 - Serve as liaison / point of contact with various regulatory bodies
 - Maintain a smooth and orderly review process with respect to regulatory examinations

- **Professional development**
 - Remain current on regulatory and compliance
 - Actively participate in industry efforts to develop / implement good compliance practices

- **Miscellaneous**
 - Primary liaison with ICI Mutual Insurance Company for insurance policies
 - Chair the Entities' Risk Identification Group
 - Member of
 - Funds' Valuation Committee
 - Adviser's Complex Security Committee
 - Ex-Officio (non-voting status) of Adviser's
 - Investment Committee, and
 - Credit Committee

Interested candidates -- Please send resume to: employment@aquilafunds.com with **CCO Opening** in the Subject Line.