

Written Supervisory Procedures (NFA Compliance Rule 2-9)

Model Program Advisors, LLC (proposed) · a multi-program commodity trading advisor · mpaclient.com

INTERNAL — Sample for counsel review · October 28, 2026 · Principal: Austin Putt · SAMPLE — to be completed with the Advisor's actual people, systems, and vendors before NFA filing; not for publication

1. Purpose and scope

These procedures implement NFA Compliance Rule 2-9, which requires each Member to diligently supervise its employees and agents in all aspects of its futures activities. They cover Model Program Advisors, LLC (the "Advisor") and every person who acts for it: its principal, any associated person, any employee, any contractor with access to client records or the doorway, and — for the matters in Section 8 — its model providers and connected brands. They are reviewed at least annually and whenever the business changes.

2. Who supervises

Designated supervisor. Austin Putt, [Managing Member], registered Associated Person, Series 3 — sole principal of the Advisor and responsible for every supervisory function in this document. [If a second principal or a compliance officer is added, insert here and allocate functions.] Until a second supervisor exists, the Advisor engages [outside compliance consultant / counsel] to perform the annual independent review in Section 11 and to serve as the escalation point for any matter in which the principal is personally involved.

Registration status. The principal's registration, Series 3, and ethics training are tracked in the registration file and reviewed [quarterly]; the Advisor does not permit any person to solicit or to act as an AP before NFA approval.

3. The program and what it is not

The Advisor's business is standardized, member-elected model replication: clients elect a program, link a trading-only access key to their own venue account, set their own limits, and the platform's replication service places orders replicating the elected model within those limits. The Advisor makes no trade-by-trade decisions for any client, holds no client funds, and operates no pool. Supervision is therefore directed at (a) the integrity of the programs and their disclosures, (b) the doorway through which clients enroll, (c) the conduct of model providers and connected brands, and (d) the Advisor's own records, fees, and communications.

4. Client onboarding (the doorway)

Sequence enforced by software; verified by the supervisor. Step 0 e-delivery consent → Step 1 Disclosure Document delivered in full and receipt acknowledged (Reg. 4.31) → Step 2 client information including NFA Rule 2-30 financial and experience questions → Step 3 Client Agreement signed → Step 4 program elected by the client after a completed demo period → Step 5 limits set by the client → Step 6 trading-only key linked and permission-checked → Step 7 confirmation and document delivery. No step may be skipped; the supervisor reviews the doorway's step log [weekly] for any out-of-order or incomplete enrollment.

Rule 2-30 review. The supervisor reviews every new enrollment's Step 2 answers within [two] business days. Where answers indicate that futures trading or the elected program is not appropriate (for example, funds the client cannot afford to lose, or no leveraged-trading experience with a 20× program elected), the supervisor contacts the client, documents the additional risk disclosure given, and records the client's decision; the Advisor may decline enrollment.

"Did anyone recommend" answers. Any affirmative answer is escalated to the supervisor the same day, logged, investigated with the connected brand under Brand Program Agreement §8, and reported to the brand's compliance contact. A marketer found to have recommended a program is barred from the Advisor's programs and the brand is required to act under its Marketing Wall.

Disclosure Document currency. The supervisor confirms monthly that the Disclosure Document in the doorway is the NFA-accepted version and is within its permitted use window, and schedules the update at least [sixty] days before expiry.

5. Programs, providers, and performance

Program approval. No program is offered until the supervisor has approved in writing: the provider's Model Provider Agreement; the program description; the fee; the venue and instrument; the Reg. 4.35 performance capsule prepared from the Model Claims File with required legends; and the risk disclosures. A program change that would alter any of these is a new approval.

Model Claims File. Every performance figure presented anywhere is traced to a venue statement of the model account, verified by the Advisor directly with the venue [quarterly], and stored with its computation. Hypothetical results (including demo results) are segregated and carry the Reg. 4.41 legend. The supervisor signs each capsule before release.

Provider supervision. The supervisor reviews the model account's activity [weekly] for conformity with the program description, for trading ahead of or against replicating clients, and for undisclosed changes; receives and logs Section 8 notices under the Model Provider Agreement; and suspends any program on a breach.

6. Promotional material (NFA Rule 2-29)

All promotional material — the public website, any brand doorway copy that describes the Advisor's programs, any presentation, social post, or script that mentions the Advisor — is reviewed and approved in writing by the supervisor before first use under the Promotional Material Review Procedures, is retained for five years with the approval record, and is re-reviewed on any change in the Disclosure Document. The public site carries no performance figures. Connected brands and their marketers may use only the approved routing statement and nothing else about the Advisor; the supervisor samples brand materials [monthly] and acts on deviations under the Brand Program Agreement.

7. Client accounts, keys, and limits

The platform's replication service verifies each linked key's permissions at linking and daily, and rejects or disables any key with withdrawal or transfer permission; the supervisor reviews the verification log [weekly]. Limits are set only by the client; any loosening requires the Limits Change Risk Acknowledgment. The supervisor reviews limit changes [weekly] for consistency with the client's Rule 2-30 information. Annual Reaffirmation lapses pause replication automatically; the supervisor reviews the lapse list [monthly].

8. Connected brands and the Marketing Wall

For each brand: a signed Brand Program Agreement before any member reaches the doorway; confirmation that the brand pays and receives nothing in respect of clients; a [quarterly] certification from the brand that its marketers have been trained on and are complying with the Marketing Wall; review of the brand's complaint and "did anyone recommend" reports; and the supervisor's authority to suspend the doorway for any brand immediately.

9. Fees and billing

Incentive fees are computed [monthly] by the platform's fee module from venue data under the high-water-mark method in the Disclosure Document, reviewed line by line by the supervisor before invoices issue, and invoiced in the Advisor's name only. The Advisor never deducts from a client's venue account. Fee disputes are complaints under Section 10.

10. Complaints

Handled under the Client Complaints and Arbitration Notice: acknowledged within [five] business days, logged, investigated by the supervisor, answered within [thirty] days, retained under Reg. 1.31, and reviewed [quarterly] for patterns. Any complaint alleging a rule violation, and any complaint involving the supervisor personally, is referred to [outside compliance consultant / counsel].

11. Records, reviews, and training

Records. Client files (consents, acknowledgments, agreements, limits, reaffirmations, terminations), the step log, key-verification log, Model Claims File, promotional-material file, complaint log, provider file, brand file, fee computations, and these procedures and their review history — all retained for five years, the first two readily accessible, under Reg. 1.31.

Annual review. An independent review of these procedures and of the Advisor's compliance with them, conducted by [outside compliance consultant / counsel], documented in a written report to the principal, with any deficiency and its correction recorded.

Training. The principal completes NFA ethics training as required and reviews these procedures annually; any new employee or contractor is trained before access to client records.

Reporting to NFA. The supervisor is responsible for Form 7-R and 8-R updates within the required periods, for the annual questionnaire, for Disclosure Document filings, and for notices of any event listed in NFA rules.

12. Related documents

Promotional Material Review Procedures · Information Systems Security Program · Business Continuity and Disaster Recovery Plan · Client Complaints and Arbitration Notice · Model Provider Agreement · Brand Program Agreement.

Adopted by: Austin Putt, [Managing Member] · [DATE] · Next review: [DATE + 12 months].

Sample procedures prepared for counsel and the Advisor's principal. Not legal advice. Counsel must conform to current NFA rules and interpretive notices and approve before adoption.