



SKRC

COMPLIANCE WEEKLY

A publication of Seward & Kissel Regulatory Compliance

June 2, 2026

SKRC Compliance Weekly is a weekly reminder of certain regulatory obligations that may apply to an SEC-registered investment adviser and CFTC-registered commodity pool operator and commodity trading advisor with a December 31 fiscal year-end that advises one or more private funds.

Obligation	Comment
Regulation S-P due 6/3/2026 ⁵	<p>Entities with assets under management less than \$1.5 billion must be in compliance with the amendments to Regulation S-P⁵. Registered Investment Advisors must develop, implement and maintain written policies and procedures for an incident response program that is “reasonably designed to detect, respond to and recover from unauthorized access to or use of customer information.” Covered entities must provide written notice to affected individuals no later than 30 days after becoming aware of a data security incident impacting sensitive customer information that is or is reasonably likely to be used in a manner that would result in substantial harm or inconvenience.</p> <p>⁵ Please note that larger managers were required to be in compliance on December 3, 2025.</p>
TIC Form SLT due 6/23/2026	<p>Must be filed by “US residents” on a monthly basis to report “long term cross border ownership” of securities in excess of \$1 billion. Data on the TIC Form SLT must be reported as of the last business day of the immediately preceding month (as-of date). The TIC Form SLT must be submitted to the Federal Reserve Bank no later than the 23rd calendar day of the month following the report as-of date. If the due date of the report falls on a weekend or holiday, TIC Form SLT should be submitted the following business day.</p>
EDGAR NEXT Annual Confirmation due 6/30/26	<p>Annual Confirmations are due within the quarter of but no later than the date chosen at the time of registration (6/30). Failure to confirm will result in code deactivation and the inability to make required filings.</p>



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If you have any questions regarding the matters covered herein, please contact your primary Seward & Kissel partner or a member of [Investment Management Group](#).

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