

Wolf Pack Wealth LLC Policies and Procedures Manual

Effective Date: [Insert Date]

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1. Introduction

Purpose of the Policies and Procedures Manual:

This manual provides guidelines to ensure compliance with applicable regulations and to establish internal standards for ethical and client-centered service. It is designed for

consistent application of Wolf Pack Wealth LLC's practices, aligned with fiduciary obligations and regulatory requirements.

Scope of the Manual:

All employees, consultants, and affiliates of Wolf Pack Wealth LLC are required to adhere to the policies set forth in this manual.

2. Corporate Governance and Organization

Chief Compliance Officer (CCO) Duties:

The CCO is responsible for managing regulatory compliance, conducting periodic reviews of policies, and overseeing any updates to ensure adherence.

Roles and Responsibilities:

Each team member's responsibilities include understanding and following company policies, completing required training, and promptly reporting any potential compliance issues to the CCO.

3. Compliance Program

Code of Ethics and Fiduciary Duty:

Employees are required to act in the client's best interest, exercise good judgment, and avoid conflicts of interest. Confidentiality, integrity, and professionalism must be upheld at all times.

Record-Keeping Policies:

Records of all client communications, advisory agreements, financial transactions, and investment advice must be maintained and stored securely.

Compliance Monitoring and Reporting Violations:

Any suspected or actual violations of the compliance program should be reported to the CCO immediately. Violations will be investigated and may result in disciplinary action.

4. Client Onboarding and Engagement

Client Identification and Initial Meeting Process:

All new clients must provide valid identification. The initial meeting assesses the client's financial goals, risk tolerance, and personal circumstances.

Onboarding Checklist and Documentation:

Ensure all clients receive and acknowledge receipt of the Form ADV Part 2A brochure and the Code of Ethics. Document all client interactions and retain necessary disclosures.

Client Agreement and Disclosure Requirements:

Each client must review and sign an advisory agreement that details Wolf Pack Wealth's services, fees, and compensation structure. Compliance disclosures must also be included.

5. Advisory Services

Financial Planning Services:

Comprehensive planning covering budgeting, savings strategies, tax planning, and retirement goals. Services will be tailored to each client's unique needs.

Portfolio Management Process:

Investment recommendations are aligned with each client's objectives and risk tolerance, focusing on diversified, risk-managed portfolios.

Retirement Plan Consulting:

For business clients, we offer 401(k) consulting services, including selection, structuring, and management support.

Insurance Solutions:

Insurance recommendations are based on client needs, maintaining a focus on non-variable products such as life insurance and annuities.

6. Fees and Billing Procedures

Fee Structure Overview:

- Monthly fees for clients with smaller accounts, transitioning to an AUM-based fee structure as client balances grow.
- Onboarding fees for new clients.

Billing Cycles and Payment Methods:

- Monthly fees are deducted from clients' checking accounts; AUM fees are deducted directly from investment accounts.

- Fees are non-refundable for partial months; AUM fees are prorated based on the number of days managed in the final billing period.

Refunds and Termination Policies:

Upon termination, fees are calculated based on services provided up to the date of termination.

7. Investment and Portfolio Management

Investment Strategy and Risk Management:

Investment strategies include asset allocation, fundamental and technical analysis, and risk mitigation. Strategies are reviewed regularly to ensure alignment with client objectives.

Client Suitability and Investment Policy Statements:

Each client's profile, risk tolerance, and goals are documented in an Investment Policy Statement (IPS) to guide portfolio management decisions.

Performance Reviews:

Portfolios are reviewed quarterly or as agreed upon to ensure alignment with client goals and market conditions.

8. Trade Execution and Brokerage Practices

Best Execution Standards:

Trade execution prioritizes cost-effectiveness, timely execution, and quality. Wolf Pack Wealth does not engage in soft-dollar arrangements.

Broker-Dealer Selection Criteria:

Brokers are selected based on reliability, competitive fees, and quality of service.

Directed Brokerage:

Clients may choose to direct brokerage; however, they must understand that this could impact the firm's ability to achieve best execution.

9. Privacy and Data Security

Client Confidentiality and Information Security Policies:

Client data is kept confidential, with secure storage and strict access protocols. Disclosure of client information requires explicit client permission, except as required by law.

Data Storage and Encryption:

All client information is stored on secure systems with encryption and restricted access.

Response Plan for Data Breaches:

In case of a data breach, the firm will notify affected clients promptly and take steps to mitigate any potential harm.

10. Personal Trading and Conflicts of Interest**Personal Trading Pre-Clearance and Reporting:**

Employees are required to pre-clear certain trades and disclose any investments that overlap with client holdings.

Restrictions on Insider Trading:

Employees must not trade on material, non-public information obtained through their role at Wolf Pack Wealth.

Conflict of Interest Disclosure and Mitigation:

Potential conflicts, including commissions from insurance sales, must be disclosed to clients and mitigated to ensure unbiased advice.

11. Client Communications**Frequency and Type of Client Reports:**

Clients receive quarterly portfolio updates and have access to online reporting tools. Major market changes or portfolio adjustments are communicated promptly.

Annual Reviews and Ongoing Communication Standards:

Annual reviews are held to discuss long-term goals and portfolio performance. Additional meetings may be scheduled as needed.

Handling Client Complaints:

All client complaints are documented and reviewed by the CCO. Resolutions are pursued in a timely and transparent manner.

12. Advertising and Marketing

Marketing Content Approval and Record-Keeping:

All marketing materials, including social media posts, must be pre-approved by the CCO to ensure compliance with regulatory standards.

Disclosure Requirements:

Advertisements must include necessary disclosures about potential risks and avoid guaranteeing specific returns.

Social Media and Digital Advertising Policies:

Social media activity must align with firm standards. Employees are prohibited from discussing client information on social platforms.

13. Anti-Money Laundering (AML) and Client Identification**AML Compliance and Reporting:**

Wolf Pack Wealth is committed to preventing money laundering and terrorist financing. Any suspicious activity must be reported to the CCO.

Client Identification Program (CIP):

Each client must provide valid identification, with documentation retained for record-keeping and audit purposes.

Ongoing Client Due Diligence:

Regular reviews ensure that client activity aligns with their profile and stated objectives.

14. Business Continuity and Disaster Recovery**Business Continuity Plan (BCP) Overview:**

Wolf Pack Wealth's BCP ensures continued operations in the event of natural disasters, system failures, or other disruptions.

Key Contact Information and Emergency Procedures:

Contact details for the CCO and IT support are provided to employees. Critical procedures are outlined for immediate response.

IT and Data Recovery Plan:

Data backups are performed regularly, with off-site storage to protect against data loss. Recovery tests are conducted periodically.

15. Training and Annual Compliance Reviews

Employee Training Program on Compliance and Ethics:

Annual training covers compliance, ethics, data security, and best practices. New employees complete initial training during onboarding.

Annual Compliance Review Process:

The CCO performs a yearly compliance review, adjusting policies as needed to meet regulatory updates and operational requirements.

Updates to Policies and Procedures:

All employees receive updates to this manual. Acknowledgment of review and compliance is required following any significant updates.