

# **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.

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## **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.

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## **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.

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## **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.

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**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.

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**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.

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**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.

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**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.

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**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.

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**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.

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**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.

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**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.

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**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.

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**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.

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## **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.