

## Conflicts of Interest

- Wolf Pack Wealth is committed to providing objective and client-centered advice. However, certain conflicts of interest may arise in the course of our services. We believe in transparency and strive to disclose all potential conflicts to help clients make informed decisions. Below are key areas where conflicts may occur:
- **Insurance and Annuity Product Compensation**
    - Wolf Pack Wealth may recommend or assist clients with **non-variable insurance and annuity products**, including traditional life insurance, indexed universal life (IUL), and fixed and indexed annuities. At this time, Wolf Pack Wealth does not offer variable insurance or annuity products, which would require broker-dealer affiliation.
    - Wolf Pack Wealth LLC may earn commissions from the sale of insurance products, such as life insurance or annuities, which could create a potential conflict of interest, as this may incentivize recommendations of commission-based products. To mitigate this conflict, Wolf Pack Wealth adheres to a fiduciary standard, ensuring that all recommendations are made in the best interest of our clients.
    - Clients are encouraged to ask questions regarding our compensation structure and any potential conflicts of interest. Wolf Pack Wealth is committed to transparency, and we disclose any compensation-related conflicts to maintain client trust and uphold our fiduciary duty.
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  - **Hybrid Fee Structure and Additional Meeting Charges**
    - The hybrid fee structure for accounts under \$100,000 includes both a monthly fee and an AUM-based fee, with additional charges for meetings exceeding the four provided annually. While this structure is intended to maintain accessible services for clients of varying account sizes, it may create an incentive to retain clients at smaller balances.
    - Wolf Pack Wealth remains committed to full transparency in fees and only recommends account structures and services that we believe are in the client's best interest.
  - **Use of a Custodian**
    - Wolf Pack Wealth uses third-party custodians to manage client assets. While we do not receive compensation from these custodians, it is important to disclose that custodians may offer other financial products or services, which may have fees associated with them. We always prioritize the client's choice and are available to discuss any custodial fees or services.

- **Referral Incentives**
  - Wolf Pack Wealth LLC may, at its discretion, offer referral incentives to existing clients for introducing new clients to the firm. These incentives are designed to reward client loyalty and encourage growth; however, they do not impact the quality or objectivity of the services provided to either the existing or referred clients.
- **Recommendation of Proprietary Products or Services**
  - While Wolf Pack Wealth does not currently offer proprietary investment products, we may develop proprietary tools or resources that are available only to clients. Any proprietary resources are designed with client benefit as the primary focus and are not created for profit generation.
  - At Wolf Pack Wealth, we are committed to addressing and mitigating any conflicts of interest by maintaining a transparent, client-focused approach in all recommendations. Our policies and procedures are designed to prioritize the client's best interests above all else.
- **Employee Adherence:**
  - All employees and representatives of Wolf Pack Wealth LLC are required to adhere to this Code of Ethics. Employees must also undergo periodic training to reinforce ethical practices and ensure ongoing compliance with these principles.

## Privacy Policy: Wolf Pack Wealth LLC

- **1. Purpose**
  - This Privacy Policy outlines Wolf Pack Wealth LLC's commitment to protecting the confidentiality and privacy of client information. It describes how we collect, use, and protect personal data, particularly as it pertains to our online client portal and digital communications.
- **2. Information We Collect**
  - **Personal Information:** We collect personal data such as name, address, Social Security number, email address, financial account information, and other relevant financial details necessary for providing advisory services.
  - **Electronic Information:** When using our client portal or website, we may also collect IP addresses, browser types, and cookies to enhance security and user experience.
- **3. How We Use Information**
  - **Client Services:** The information we collect is used solely to provide advisory services, including financial planning, account management, and personalized recommendations.
  - **Communication:** We use client contact information to provide updates, send reports, and share relevant financial insights. Client consent is obtained for any marketing communications.
- **4. Information Protection Measures**
  - **Data Security:** We implement security measures such as encryption, access controls, and secure storage to protect client information from unauthorized access, misuse, or loss.
  - **Access Control:** Only authorized employees and service providers who require access to client data for service delivery have access to sensitive information. All employees undergo training on privacy best practices and data protection.
- **5. Sharing of Information**
  - **Third-Party Service Providers:** We may share client data with third-party service providers who support our advisory services (e.g., compliance software, portfolio management tools), provided these partners meet stringent data security standards.
  - **Regulatory and Legal Requirements:** We may disclose client information if required by law or as necessary to comply with regulatory requests.
- **6. Client Rights**
  - Clients have the right to access their personal information, request corrections, and opt out of certain data uses. Requests can be submitted to Wolf Pack Wealth's office location.
- **7. Compliance Monitoring**
  - Wolf Pack Wealth LLC conducts regular internal audits and compliance checks to ensure adherence to these policies. These reviews are performed [monthly/quarterly/annually] and are documented to maintain regulatory compliance.

## Business Continuity Plan

- **Wolf Pack Wealth LLC Business Continuity Plan**
- **1. Purpose**
  - Wolf Pack Wealth LLC is committed to maintaining continuity of service to clients in the event of an emergency or operational disruption. This Business Continuity Plan (BCP) outlines key protocols and processes to minimize disruption and ensure essential services remain accessible.
- **2. Key Elements of the Business Continuity Plan**
  - **Data Backup and Recovery:** All client data and records are regularly backed up and stored in secure, redundant locations, ensuring data accessibility even in the event of system failures.
  - **Operational Recovery:** In the event of a significant disruption, we will operate remotely through secure, cloud-based systems. Advisors and staff are equipped to access client information and tools from alternate locations.
  - **Communication with Clients:** During a disruption, clients will receive timely updates through email or via notifications on our website. We will also establish alternative contact methods as needed.
  - **Vendor and Partner Collaboration:** Wolf Pack Wealth maintains relationships with key partners (e.g., compliance and portfolio management vendors) who also have contingency plans, ensuring ongoing support and access to essential services.
- **3. Incident Management and Recovery Time**
  - In case of a localized incident (e.g., temporary office closure), services are expected to resume within 24-48 hours. For larger disruptions, the continuity team will assess recovery needs and prioritize essential client services until full operations are restored.
- **4. Annual Review and Testing**
  - This Business Continuity Plan is reviewed and updated annually, with testing of remote access and data recovery systems to ensure readiness for a variety of potential disruptions.
- **5. Regulatory Notification:**
  - In the event of a significant business disruption, Wolf Pack Wealth LLC will promptly notify affected clients and the Nevada Securities Division, as required, about the nature and expected duration of the disruption. The firm will provide regular updates to clients and regulators until normal operations resume.

Wolf Pack Wealth LLC