

Revolution Capital, Inc. Advisory Policies & Procedures

In addition to those policies and procedures set for in our Comprehensive Written Information Security Program and our Social Media Policies, Revolution Capital, Inc. (the “Firm”) shall conform to and enforce the following policies and procedures in our provision of advisory and wealth management services to clients.

I. PORTFOLIO MANAGEMENT

All client portfolios must be managed in a manner consistent with the client’s investment objectives, relevant law and regulations, and the Firm’s representations to that client. In addition:

1. there shall be no preferential treatment of any client with regard to investment opportunities;
2. all client accounts must be reviewed at least quarterly;
3. the firm shall not be responsible for any proxy voting for client positions;

II. ACCURATE DISCLOSURE TO CLIENTS

To ensure that written information communicated to our clients is accurate, the Firm requires that all IAR’s comply with the following policies and procedures:

1. the firm will not accept any client relationship prior to the signing of a written Financial Planning Agreement or Investment Advisory Agreement and the delivery of the ADV part II disclosure document to the prospective client;
2. clients will be offered an updated form ADV part II at least annually in digital or hard copy form;
3. clients shall be given instruction on retrieving personal account information from the custodian online and offered the opportunity to receive either hard copy or electronic statements from the custodian directly;
4. any advertising, newsletter or marketing materials must be approved by the Chief Compliance Officer prior to dissemination; this shall include materials disseminated electronically, except as provided below in “Social Media Policy.”

III. PROPRIETARY TRADING

The firm does not engage in proprietary trading.

IV. SAFEGUARDING OF CLIENT ASSETS

All client assets must be held with a third-party custodian approved by the firm:

1. approved custodians are independent of Revolution Capital, and have provided reasonable assurances of their ability to safeguard client assets and comply with applicable law and regulations pertaining to client accounts;
2. client deposits and transfers must be made directly into a custodial account;
3. checks written to a client account but held by an IAR must be delivered to the appropriate custodial account within the time allowed by law;

V. RECORD CREATION AND MAINTENANCE

The firm will create and maintain all records as required by law and regulatory agencies, including but not limited to: Client Agreements, ADV Forms and ADV updates or amendments, client account information, client planning information, and marketing materials, including “advertisements” within the definition provided by FINRA. Except as required by law, all records will be kept in digital format and regularly updated.

To comply with legal requirements and for the purposes of client service continuity, documents related to a client’s financial planning and investments will be retained for a period of 7 years after the client

relationship is terminated. However, client tax identification numbers will be deleted from any digital database within 1 year following the termination of the client relationship.

VI. PROTECTION OF CLIENT PERSONAL INFORMATION

The Firm's Comprehensive Written Information Security outlines the policies and procedures instituted to protect the privacy of our clients. A copy of the WISP is included on the Revolution Capital website.

VII. TRADING PRACTICES

The Firm manages only publicly traded investments through its arrangements with third-party custodians. The following policies apply:

1. the firm manages discretionary advisory accounts;
2. once and IAR has determined that a trade is in the best interest of the client or has received a direct request from the client, that trade must be made as soon as practicable, with consideration given to market fluctuations;
3. the firm shall have no soft-dollar arrangements with vendors or third-party service providers, except as follows: the firm receives discounts on its contracts with software providers Right Capital and Wealthbox as part of a standard client package from Altruist.
4. the firm does not aggregate client trades, though trades may be aggregated by the custodian;

VIII. MARKETING

All marketing materials disseminated to the public in hard copy or electronically must first be approved by the Chief Compliance Officer. No IAR of the firm may knowingly violated law or regulations pertaining to public representations by the firm, including but not limited to testimonials, representations about the firm, representations about investment performance, or investment recommendations. Revolution Capital does not include testimonials, performance claims or specific investment advice in marketing materials.

IX. CLIENT MANAGEMENT FEES

Management Fees are charged to client accounts quarterly, payable in arrears. Fees are calculated as follows:

1. management fees are based exclusively on a percentage of assets under management and are calculated with reference to the account balance on the last business day of the preceding quarter; or, if an account is being terminated prior to the end of the quarter, on the day that the advisor receives notice of this termination;
2. fees are due on the first business day following the close of the preceding calendar quarter.

X. BUSINESS CONTINUITY

To minimize disruption of client service in the event of a catastrophic emergency, the Firm has instituted a Business Continuity Plan and an Emergency Notice for the benefit of clients, copies of which are kept in organizational records and made public on the Revolution Capital website.

XI. SOCIAL MEDIA POLICY

It is the policy of Revolution Capital to permit IAR's to maintain professional social media accounts and to maintain professional blogs subject to the following provisions:

1. All professional social media accounts must be approved by the Chief Compliance Officer and archived by the firm's third-party digital archiving servicer;
2. The Compliance Officer must be notified of any new professional accounts an IAR wishes to open and of the termination of any existing accounts;
3. The Compliance Officer must be provided with login information for all professional accounts;
4. The content of all social media accounts must be kept in compliance with regulations and guidelines for RIA's; including prohibitions and limitations on testimonials, performance claims, misleading

information, the conveyance of personal investment advice and/or recommendations regarding specific investments;

5. In keeping with these regulations any “posts” to a professional social media account must be approved prior to posting; discussions need not receive prior approval but must conform to the policies included herein;
6. No advisor will post investment performance claims, testimonials or specific investment advice on social media or in blog posts;
7. Advisors may reference specific investments or investment strategies in social media or blog posts but must include a disclaimer making clear that the above does not constitute investment advice;
8. Social media settings allowing for testimonials must be turned off whenever possible;
9. Professional blogs may allow moderated comments; however, a comment policy clearly stating standards for comment approval must be posted on the blog site;
10. The Compliance Officer will review any complaints or allegations of improper content on social media or blogs and will take whatever action necessary to remedy violations of firm policy;
11. No third-party advertisements or endorsements shall be included in advisor or firm social media or blog accounts;
12. Advisors should ensure that links included in posts be to reputable third-party sites; if an advisor is unsure of the quality of a third-party site, he or she must first have the site approved by the Chief Compliance Officer before including a link.

XII. CODE OF ETHICS

1. Revolution Capital, Inc. has a fiduciary duty to its clients, and all actions that are taken by the firm and its representatives shall reflect and conform to this duty;
2. All advisor representatives of Revolution Capital must comply with applicable federal and state securities laws;
3. All access persons must report their personal securities transactions and holdings quarterly for review by a supervisory IAR;
4. Any employee must promptly report violations of this Code of Ethics to the Chief Compliance Officer;
5. All supervised employees must be provided with a written copy of this Code of Ethics; the Chief Compliance Officer shall maintain a signed, written record of the employee’s receipt of this document.
6. No agent or employee of the Firm shall engage in behavior prohibited by “insider trading” laws.

The firm has designated Douglas Soons as Chief Compliance Officer.

The above policies and procedures shall next be reviewed on or before January, 2023.