



Compliance Manual & Code of Ethics

OF

Alpha Wealth Funds, LLC.

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Introduction

This Compliance Manual identifies the compliance policies and procedures that have been adopted by ALPHA WEALTH FUNDS, LLC (the “Firm” or “ALPHA WEALTH FUNDS”) relating to its investment advisory business.

In general, this Compliance Manual’s purpose is twofold. First, the Manual provides the Firm’s advisory personnel with an introduction to the laws, rules and code governing investment adviser activities. Second, the Manual provides a framework for the Firm’s directors, officers and employees to conduct their respective duties and obligations under both federal and state securities laws with respect to the Firm’s investment advisory business. This Manual does not completely cover all of the possible issues and factual circumstances which may arise in relation to the Firm’s advisory business.

The Firm’s compliance program is designed using a risk-based approach that considers the nature of the Firm’s advisory business, clients, products, conflicts of interest, and applicable regulatory requirements. The Firm periodically assesses these risks and updates its policies and procedures as appropriate.

Furthermore, additional considerations, requirements and restrictions may apply on a case by case basis. Therefore, all questions and actions with respect to compliance-related matters should be directed to, and approved by, the Chief Compliance Officer (“CCO”). When in doubt, Firm personnel should consult with the CCO before they act. This Manual is only a guide. An employee may, in good faith, be unsure about the Manual’s application in a particular situation. In such cases, consultation with the CCO is mandatory.

Rule references herein are to the Investment Advisers Act of 1940 (the “Advisers Act”) and the rules of the U.S. Securities and Exchange Commission (“SEC”). References to the “Commission” or “SEC” shall refer to the U.S. Securities and Exchange Commission.

The Firm maintains written compliance policies and supervisory procedures reasonably designed to prevent violations of the Advisers Act and other applicable federal and state securities laws. This Compliance Manual is meant to allow the Firm to maintain supervisory procedures reasonably designed to achieve compliance with the Act, applicable laws, regulations, and rules of self-regulatory organizations. These supervisory policies are maintained internally by the Firm and are available for regulatory inspection upon request. The Firm shall maintain a true, accurate and current copy of the written supervisory procedures in a secure Google Drive with its other compliance documents. The written supervisory policies and procedures shall be sent to all employees of the Firm.

References herein to the “CCO” are to **Aimee Spencer**, the Firm’s designated Chief Compliance Officer.

This Compliance Manual is meant to be a guide for Firm personnel and to assist them in the performance of their duties and responsibilities. All supervised persons (officers, employees, and investment adviser representatives of the Firm) are required to:

- Read this Compliance Manual in full;
- Sign an acknowledgment of receipt and acceptance (see *Appendix A*); and
- Participate in compliance training sessions and read any compliance memoranda distributed by the Firm.

This Compliance Manual will be reviewed and updated no less than annually, and more frequently as necessary to address changes in the Firm’s business, applicable laws and regulations, technology, cybersecurity risks, products and services, or identified compliance risks.. All supervised persons are expected to comply with the most current version of the Manual and related procedures. Any updates or material amendments will be communicated by the CCO to all personnel in a timely manner.

Federal and State Regulations In General

The Advisers Act was enacted by Congress in order to regulate the business of persons providing investment advice or providing investment advisory materials to the public. The National Securities Markets Improvement Act of 1996 (“NSMIA”) divided the registration of investment advisers and their representatives between federal and state authorities. Under this framework, investment advisers are either registered with the SEC or with state securities authorities, depending on the scope and nature of their business.

Generally, investment advisers with regulatory assets under management (AUM) of \$100 million or more are required to register with the SEC. Advisers with less than \$100 million in regulatory AUM will register with the state in which they maintain their principal office and place of business, unless another exemption or condition applies.

Under the Advisers Act and Rule 203A-1, investment advisers are eligible or required to register with the SEC under the following circumstances:

1. **Larger Advisers:** Advisers with regulatory AUM of \$100 million or more may register with the SEC and must do so once Regulatory AUM reaches \$110 million.
2. **Mid-Sized Advisers:** Advisers with Regulatory AUM between \$25 million and \$100 million may register with the SEC only if:
 - They are not required to be registered with the state in which they have their principal office and place of business;
 - They are not subject to examination as investment advisers by that state;
 - They are required to register in 15 or more states; or
 - They act as an adviser to a registered investment company or business development company.

3. Other Eligible Advisers: Certain other types of advisers may register with the SEC regardless of AUM, including:
 - Pension consultants meeting SEC requirements;
 - Affiliates of SEC-registered advisers;
 - Advisers expecting to be eligible for SEC registration within 120 days of filing;
 - Multi-state advisers;
 - Internet-only advisers;
 - Nationally recognized statistical rating organizations (NRSROs).

Regulatory AUM is defined by the instructions to Item 5 of Form ADV and includes the market value of all securities portfolios over which the adviser provides continuous and regular supervisory or management services. The calculation must be made on a gross basis and must include:

- Proprietary accounts;
- Family accounts;
- Accounts managed without compensation;
- Uncalled capital commitments to private funds.

This method of calculating Regulatory AUM is used for compliance and registration purposes and may differ from how advisers report assets under management to clients or in marketing materials. The term “Regulatory” is used in this context to distinguish it from other AUM calculations.

Rule 203A-1 also provides a buffer range to help advisers determine when to register or withdraw SEC registration. Advisers must register with the SEC at \$110 million in Regulatory AUM, and may remain registered unless their Regulatory AUM falls below \$90 million, at which point SEC registration must be withdrawn unless another basis for registration exists.

Certain advisers are exempt from SEC registration under the Advisers Act, including:

1. Private Fund Advisers with less than \$150 million in Regulatory AUM in the U.S.;
2. Venture Capital Fund Advisers;
3. Foreign Private Advisers with limited U.S. clients and assets.

Advisers relying on these exemptions are not required to register but must still comply with certain reporting requirements as Exempt Reporting Advisers and are subject to SEC examination.

The principal office and place of business of an adviser is defined under Rule 203A-3(c) as the location where the executive office of the adviser is located and where officers or partners direct, control, and coordinate the adviser’s activities. An investment adviser may have only one principal office and place of business for registration purposes.

ALPHA WEALTH FUNDS is registered with the SEC and complies with the applicable provisions of the Advisers Act and related SEC rules. Although the Firm is not required to register at the state level, it may still be subject to notice filing and other compliance obligations in certain states where it conducts business or has clients. Firm personnel should consult the Chief Compliance Officer (“CCO”) if they have any questions regarding registration status or applicable regulatory requirements.

Registration of the Firm and Its Representatives

ALPHA WEALTH FUNDS is registered with the SEC as an investment adviser under the Act and has filed its Form ADV with the IARD. Form ADV generally requires information about the characteristics of the Firm’s business and principal personnel. Part 2A of the Form ADV generally requires information about the advisory services offered by the Firm, including certain disclosures which must be given to advisory clients. Part 2B of Form ADV generally requires information about the Firm’s advisory personnel on whom the particular client receiving the brochure relies for investment advice. It shall be the responsibility of the CCO to keep the Firm’s Form ADV (Parts 2A, 2B, and 3 (CRS)) current and accurate. All supervised persons are responsible for promptly notifying the CCO of any actual or anticipated changes to their business activities, or any other information that may require an amendment to the Firm’s Form ADV or related regulatory filings.

Although the Firm is registered with SEC rather than any individual state securities authority, its investment adviser representatives (“IARs”) may be required to register in states where they have a place of business or where they solicit or service clients. Most states require IARs to pass the Series 65 exam or the combination of Series 7 and Series 66, unless the individual holds an accepted professional designation such as CFA®, CFP®, ChFC®, PFS, or CIC. The CCO will determine registration or notice filing requirements for the Firm and its representatives in each state where business is conducted.

ALPHA WEALTH FUNDS may be subject to certain state laws in which it conducts business or has investors. The Firm may be required to

file notice with state securities authorities. The CCO will be responsible for consulting the requirements of the appropriate state securities authority in which the Firm conducts business to determine if such is required.

States may require the registration of an associated person, which is a subset of an investment adviser's supervised person. It is incumbent upon supervised persons to apprise the CCO of those states in which they are prospecting or conducting business. At such time, the relevant supervised person will coordinate with the CCO to ensure that all steps are taken to satisfy the applicable registration requirements on a prompt basis.

In the event that the Firm decides to conduct business in a new location, the CCO shall be responsible for examining each applicable state's laws with respect to notice filing of the Firm and its representatives, and will ensure that the appropriate notification or other filings are made and fees paid.

Responsibilities and Qualifications of the Chief Compliance Officer

Responsibilities of the Chief Compliance Officer

In fulfillment of the requirement stated above, ALPHA WEALTH FUNDS has designated a full-time Chief Compliance Officer responsible for administering the Firm's compliance program. The CCO performs these responsibilities from the Firm's approved work locations and maintains regular access to the Firm's personnel, records, and systems necessary to fulfill the duties of the position. Aimee Spencer shall serve as the CCO. The primary responsibilities of the CCO include assuring that ALPHA WEALTH FUNDS' compliance and supervisory procedures are designed to promote compliance with applicable laws, regulations and industry practices; and to advise those members of the Firm's management with responsibility for supervising the investment advisory activities of the Firm and its associates providing investment advisory services.

The CCO is responsible for all regulatory interactions and correspondence involving the Firm or any of the clients with federal or state regulatory agencies, departments, and offices. This includes all required regulatory reporting. The CCO is responsible for administering the Firm's compliance program, conducting periodic compliance testing and risk assessments, coordinating the annual compliance review, overseeing regulatory filings, supervising compliance training, and monitoring implementation or corrective actions.

The CCO may assign other associates of ALPHA WEALTH FUNDS to assist in fulfilling their responsibilities. *Any duties or responsibilities of the CCO referenced in this compliance manual may be performed by either the CCO or a qualified designee.*

However, ultimate responsibility for ensuring that ALPHA WEALTH FUNDS and its associates comply with the provisions of this manual and the federal and state securities laws, rests with the Firm's senior management, even if specific responsibilities are delegated to the CCO or other personnel.

Qualifications of the Chief Compliance Officer

In order to serve as the CCO of ALPHA WEALTH FUNDS, an individual must have sufficient and relevant financial industry experience. Aimee Spencer has been designated as the Firm's CCO based on her qualifications, background and experience.

References to Employees or Associates

There are numerous references made in this Compliance Manual to the conduct of employees or associates of ALPHA WEALTH FUNDS. The policies and procedures described in this Manual apply to all supervised persons of the firm, including any employees, investment adviser representatives, and other associated persons.

Any violations of the policies or procedures contained in this Manual, or any of the rules or regulations of the applicable regulatory bodies, may be grounds for disciplinary action either by the Firm or by regulatory bodies.

Civil suits and penalties, criminal fines and imprisonment are also possible outcomes for breaches of federal and state securities laws.

1. ADVISORY AGREEMENTS/CONTRACTS

1.1 General

It is the policy of ALPHA WEALTH FUNDS that a written agreement will be executed by the client and the Firm prior to the initiation of any advisory services. The Investment Adviser Representative must ensure that the client has granted such authority by obtaining the client's signature on the appropriate client agreement. This includes agreements for financial planning services (the "Financial Planning Agreement") and for providing investment advisory recommendations (the "Advisory Agreement").

ALPHA WEALTH FUNDS also acts as the general partner and investment manager of The Insiders Fund, LP ("Insiders"), the Alpha Low Volatility Fund ("Low Vol"), the Alpha Low Volatility Fund II ("Low Vol II"), the Alpha Synthetic Equity Protection Fund ("ASEP"), and the Alpha Wealth Volatility Advantage Fund ("Vol Ad"). These together are called the "Funds." As the general partner, ALPHA WEALTH FUNDS is solely responsible for the management of the Funds. Investors in the Funds are limited partners (the "Limited Partners").

It is the policy of ALPHA WEALTH FUNDS that written agreements will be executed by each prospective Limited Partner and a principal of the Firm, prior to an individual or entity being admitted as a Limited Partner in any of the Funds. Limited partners in the Funds will execute a subscription agreement and a limited partnership agreement (the “Fund Agreements” and, collectively with the Advisory Agreement, the “Agreements”). ALPHA WEALTH FUNDS shall also provide all prospective Limited Partners with its most recent private placement memorandum. No investor shall be admitted to a private fund until all subscription documents, required disclosures, investor qualification documentation, and applicable compliance reviews have been completed and approved.

Each Agreement shall be submitted to the CCO for review as soon as practicable following execution. Advisory services and securities transactions may commence once the required agreements have been fully executed and all necessary account documentation has been completed. The CCO will review executed agreements and supporting documentation to verify that they conform to applicable law, Firm policies, and regulatory requirements. If any deficiencies, omissions, or corrections are identified during the review, the CCO will notify the appropriate personnel, and the necessary corrective action shall be completed promptly and documented as appropriate. The investment adviser representative responsible for the account shall ensure that all required agreements, disclosures, and account documentation have been properly completed prior to initiating advisory services or discretionary trading.

1.2 Required Disclosures in the Agreements

As a general practice, ALPHA WEALTH FUNDS will rely on its standard form Financial Planning Agreement to the fullest extent possible. ALPHA WEALTH FUNDS requires that a fully executed Financial Planning Agreement be in the Firm’s possession and approved before any financial planning services are rendered. The CCO will supply all appropriate Firm personnel with the most current version of the Financial Planning Agreement. Any changes to the standard agreement must be reviewed and approved in advance by the CCO. Only the most current version of the standard agreement, as approved by the CCO, may be used. Outdated versions are not permitted.

The Financial Planning Agreement outlines the scope of the planning services to be provided, the applicable fees, key disclosures, and other terms of the client relationship. The Firm shall not enter into, extend, or renew any Financial Planning Agreement unless the agreement is in writing and discloses the following:

- the services to be provided;
- the term of the Financial Planning Agreement;
- the financial planning fee; and
- the amount of any prepaid fee to be returned in the event of termination or nonperformance

ALPHA WEALTH FUNDS requires that its standard Advisory Agreement be executed before advisory services are provided to a client. As a general practice, ALPHA WEALTH FUNDS will rely on its standard form investment advisory agreement to the fullest extent possible. An Advisory Agreement executed by the client must be in ALPHA WEALTH FUNDS’ possession before investment advisory services are provided to such client. Executed Advisory Agreements will be reviewed by the CCO as soon as practicable following execution as part of the Firm’s ongoing compliance oversight and the CCO will communicate any required corrections or deficiencies to the appropriate personnel. The CCO will supply all appropriate Firm personnel with the most current copy of ALPHA WEALTH FUNDS standard Advisory Agreement. All changes to the standard Advisory Agreement must be approved in advance by the CCO. Only the most current version of the standard agreement, as approved by the CCO, may be used. Outdated versions are not permitted.

The advisory contract will define the scope of the work to be completed for the client, the advisory fees, important disclosures and other terms of our client relationship. The Firm’s standard Advisory Agreement may be used for a variety of advisory relationships, including traditional assets-under-management arrangements and certain grandfathered advisory relationships with alternative fee structures. Any non-standard fee arrangement or contractual provision must be documented in the Advisory Agreement and approved in accordance with the Firm policy. The Firm shall not enter into, extend, or renew any Advisory Agreement unless the Advisory Agreement is in writing and discloses the following:

- the services to be provided;
- the term of the Advisory Agreement;
- the advisory fee;
- the formula for computing the fee;
- the amount of prepaid fee to be returned in the event of Advisory Agreement termination or nonperformance;
- an indication of whether the contract grants discretionary power to the adviser; and
- that no assignment of the Advisory Agreement shall be made by the Firm without the consent of the other party to the Advisory Agreement.

Pursuant to Rule 205-3 under the Investment Advisers Act of 1940, ALPHA WEALTH FUNDS may only enter into, extend, or renew advisory contracts that include performance-based fees with clients who meet the rule’s definition of a ‘qualified client.’

- a) The client entering into the contract is:
 1. A natural person or a company who, immediately after entering into the contract, has at least \$1,400,000 under the management of the investment adviser;
 2. A person who the investment adviser and its investment adviser representatives reasonably believe, immediately before

entering into the contract, is a natural person or a company whose net worth, at the time the contract is entered into, exceeds \$2,700,000. The net worth of a natural person may include assets held jointly with that person's spouse;

3. A qualified purchaser as defined in section 2(a)(51)(A) of the Investment Company Act of 1940 at the time the contract is entered into; or
 4. A natural person who immediately prior to entering into the contract is:
 - i. An executive officer, director, trustee, general partner, or person serving in a similar capacity of the investment adviser; or
 - ii. An employee of the investment adviser (other than an employee performing solely clerical, secretarial or administrative functions with regard to the investment adviser) who, in connection with his or her regular functions or duties, participated in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.
- b) The compensation paid to the Firm with respect to the investment performance of the Client's account is based on a formula with the following characteristics:
1. In the case of securities for which market quotations are readily available, the formula must include the realized capital losses and unrealized capital depreciation of the securities over the period;
 2. In the case of securities for which market quotations are not readily available the formula must include:
 - i. The realized capital losses of securities over the period, and
 - ii. If the unrealized capital appreciation of the securities over the period is included, the unrealized capital depreciation of the securities over the period; and,
 - iii. The formula must provide that any compensation paid to the investment adviser under this rule is based on the gains less the losses, computed in accordance with the previous two subsections.
- c) The Firm discloses to the Client all material information concerning the Advisory Agreement, including:
1. That the fee arrangement may create an incentive for the investment adviser to make investments that are riskier or more speculative than would be the case in the absence of a performance fee;
 2. Where relevant, that the investment adviser may receive increased compensation with regard to unrealized appreciation as well as realized gains in the client's account;
 3. The periods which will be used to measure investment performance throughout the contract and their significance in the computation of the fee;
 4. The nature of any index which will be used as a comparative measure of investment performance, the significance of the index, and the reason the investment adviser believes that the index is appropriate; and,
 5. Where the investment adviser's compensation is based in part on the unrealized appreciation of securities for which market quotations are not readily available within the meaning of Rule 2a-4(a)(1) under the Investment Company Act of 1940, how the securities will be valued and the extent to which the valuation will be independently determined.
- d) The Firm, and any investment adviser representative, who enters into the contract reasonably believes, immediately before entering into the contract that the contract represents an arm's length arrangement between the parties and that the client, or in the case of a client which is an entity, the person representing the company, understands the proposed method of compensation and its risks

ALPHA WEALTH FUNDS will notify the client if there are any changes to the ownership or management of the firm within a reasonable time after the change occurs.

Once the client executes and returns the Agreements, the CCO will set up and maintain a separate electronic file for such client, which shall include all client information, including the client's investment objectives and the executed Agreements. All client files must be maintained chronologically, so that any inspection of the file reveals changes or new information received after the relationship was established. ALPHA WEALTH FUNDS requires that the associated person obtain and document all client information that is needed for appropriate

recommendations to be made. Associated persons are responsible for obtaining and maintaining accurate client information and for promptly updating client records when they become aware of material changes to a client's circumstances, investment objectives, financial condition, account information, or other information relevant to the advisory relationship. Any changes requiring regulatory filings, amendments to client agreements, or presenting compliance or legal concerns shall be escalated to the CCO.

Only authorized officers and representatives are authorized to execute Agreements on behalf of ALPHA WEALTH FUNDS. The Firm representative who signs an Agreement(s) on behalf of the Firm is responsible for ensuring that the CCO receives the executed Agreement(s) before it is forwarded to the client. No additions or deletions may be made to the advisory contract language without prior approval of the CCO.

ALPHA WEALTH FUNDS's standard advisory fee schedule must be included with every Advisory Agreement. The Firm's fee schedule also is set forth in its Part 2A of Form ADV. Prior to or at the time of entering into an Advisory Agreement, ALPHA WEALTH FUNDS will deliver to each client a copy of its current Form ADV Part 2A, 2B, and 3 as required by Rule 204-3 under the Advisers Act.

Electronic signatures and electronic delivery of agreements may be accepted where permitted by applicable law and consistent with Firm's policies. Electronic records shall be retained in accordance with applicable law and with the Firm's recordkeeping policies.

1.3 Fee Disclosures

The investment adviser representative who enters into the contract must reasonably believe, immediately before entering into the contract, that the client understands the proposed method of compensation and its risks.

1. Standard Fees and Management Fees.

An adviser, as a fiduciary, must make full and fair disclosure to clients about the fees it charges. Any fees which are not part of the Firm's standard fee schedule must be approved by the CCO before such fees are implemented.

For the Funds, ALPHA WEALTH FUNDS will assess an annual managed fee to be paid in advance to ALPHA WEALTH FUNDS on a monthly basis. The monthly management fee will be 1/12 of 2.0% (2.0% per annum) of each Client's closing net asset value for such month. The fee may be negotiated in accordance with the Firm's fee schedule and policies, subject to appropriate approval and documentation.

For its separately managed accounts, the Firm will assess an annual managed fee to be automatically deducted by the custodian broker from their separately managed accounts at ALPHA WEALTH FUNDS on a daily basis. The annual management fee will be 1.5% (1.5% per annum) of each Client's closing net asset value. The fee may be negotiated at manager's discretion.

Certain clients who joined the Firm through the acquisition or transition of an advisor's existing advisory practice remain subject to grandfathered consulting fee arrangements that were established as part of that transition. The applicable fee schedule and scope of services are set forth in the client's executed Advisory Agreement. These legacy fee arrangements are not offered to new clients except as otherwise approved by Firm management. When a client also participates in one or more of the Firm's investment options, fees will be administered in accordance with the Advisory Agreement to avoid duplicative billing for the same advisory services.

Financial planning services are typically provided for a one-time fee, which generally falls between \$1,500 and \$15,000. Actual fees are determined on a case-by-case basis and depend on factors such as the complexity of the plan, the assets involved, the number of participants, time required, and other considerations specific to the client's circumstances. Fees are addressed upfront and agreed to in writing so there are no unexpected charges. If a client requests a revision to a completed financial plan such as: changes resulting from a significant life event (e.g., marriage, divorce, inheritance, business sale), a shift in financial goals, or updates to assumptions used in the original analysis, a flat fee of \$1,000 will apply. Minor updates that fall within the scope of the original engagement may be accommodated at no additional cost, at the Firm's discretion. Fees may be assessed case by case based on the needs of the client and the adviser.

Where a client receives multiple services from the Firm, fee arrangements shall be structured to avoid duplicative fees unless specifically disclosed and agreed on by the client.

2. Performance Fees.

Rule 205-3 of the Code places certain restrictions on how and to whom an investment adviser may charge performance fees, as described in the previous section.

For the Funds, ALPHA WEALTH FUNDS charges a performance fee equal to 20% of the net capital appreciation allocated to each Limited Partner during each calendar year; provided however, that such Performance Fee shall be subject to a loss carry-forward provision, also known as a "High Water Mark," so that no Performance Fee will be deducted from any Partner's capital account until prior losses allocated to such Partner have been recouped. Performance Fees may be made at any time, in the sole discretion of ALPHA WEALTH FUNDS, for a Partner who makes a partial or complete withdrawal. For further information refer to the Private Placement Memoranda for the funds.

1.4 Hedge Clauses are Not Permitted

Neither the Firm nor any of its advisers may enter into contracts with clients that contain clauses commonly referred to as “hedge clauses.” Such clauses attempt to waive or limit the Firm’s fiduciary obligations or otherwise mislead clients regarding their legal rights. The Firm requires all of its employees to take responsibility for their performance and therefore does not permit any hedge clauses. Please consult with the CCO for any questions regarding hedge clauses.

2. BOOKS & RECORDS

2.1 Responsibility for Preparation and Maintenance

Compliance with the record keeping requirements under Rule 204-2 of the Advisers Act satisfies any recordkeeping requirements for SEC registered investment advisers.

It is the responsibility of the CCO to establish, administer, and oversee the Firm’s books and records program to ensure compliance with the Advisers Act and other applicable securities laws. While the CCO is responsible for oversight of the Firm’s recordkeeping policies and procedures, all supervised persons are responsible for creating, maintaining, and preserving records relating to their assigned duties in accordance with Firm policies. The CCO may delegate specific recordkeeping responsibilities to qualified personnel or third-party service providers; however, the CCO retains overall responsibility for oversight of the Firm’s recordkeeping program. The SEC and other applicable regulatory authorities have a right to inspect records maintained by the Firm in accordance with applicable law.

2.2 Compliance with Books and Records Rule

Registered investment advisers shall maintain and preserve in an easily accessible place, the following records for a period of **not less than five years** from the end of the fiscal year during which the last entry was made on such record. The Firm maintains books and records using secure cloud-based platforms and third-party service providers. These include systems supporting email, document management, portfolio management, custodial records, accounting, cybersecurity, and regulatory compliance. The CCO is responsible for ensuring that records remain secure, accessible, and retained in accordance with applicable regulatory requirements. Advisers will use secure storage facilities provided by Google and redundant backup provided by various third-party services. These services are used where needed and include but are not limited to; Spanning.com, by Prime Brokerage Interactive Brokers and TradeStation, by banking providers such as Zion’s Bank. Accounting records are kept by independent CPA and bookkeeping firms using Quickbooks Online.

1. A journal or journals, including cash receipts and disbursements records, and any other records of original entry forming the basis of entries in any ledger.
2. General and auxiliary ledgers, (or other comparable records) reflecting asset, liability, reserve, capital, income and expense accounts.
3. A memorandum of each order given by the investment adviser for the purchase or sale of any security, of any instruction received by the investment adviser from the client concerning the purchase, sale, receipt or delivery of a particular security, and of any modification or cancellation of any such order or instruction. Such memoranda shall show the terms and conditions of the order, instruction, modification or cancellation; shall identify the person connected with the investment adviser who recommended the transaction to the client and the person who placed such order; and shall show the account for which entered, the date of entry, and the bank or dealer by or through whom executed where appropriate. Orders entered pursuant to the exercise of discretionary power shall be so designated.
4. All checkbooks, bank statements, cancelled checks, and cash reconciliations.
5. All bills, or statements, paid or unpaid, relating to the adviser’s business as an investment adviser.
6. All trial balances, financial statements, and internal audit working papers relating to the adviser’s business as an investment adviser.
7. A record of the annual compliance review, including any changes made to the Compliance Manual during the course of the review.
8. **Code of Ethics**
 - i. A copy of the Firm’s code of ethics that is in effect or at any time within the past five years was in effect.
 - ii. A record of any changes made to the Code of Ethics during the course of the annual compliance review.
 - iii. A record of any violation of the code of ethics and any action taken as a result of the violation.
 - iv. A record of all written acknowledgements of the code of ethics for each person who is currently, or within the past five years was, a supervised person of the Firm.
9. **Holding and Transaction Reports**
 - i. **Holding Report:** A record of every Reportable Security in which an Access Person has, or by reason of any transaction

acquires, any direct or indirect beneficial ownership. The record shall state the following: (a) the title and type of the security involved; (b) the ticker symbol or CUSIP number where applicable; (c) the number of shares or principal amount; and (d) the name of the broker dealer or bank with or through whom the transaction was effected.

- ii. **Transaction Report:** A record of every transaction in which the adviser or the adviser representative of the adviser has acquired any direct or indirect beneficial ownership of a security. The record shall state the following: (a) the title and amount of the security involved; (b) the date and nature of the transaction, including whether it is a purchase, sale or other acquisition or disposition; (c) the price at which the transaction was effected; (d) the nature of the transaction; and (e) the name of the broker, dealer, or bank with or through whom securities are held for the Access Person's direct or indirect benefit, and the date the report is submitted.
 - iii. A record of the names of persons who are currently or within the past five years were associated persons of the Firm.
 - iv. A record of any decision and the reasons supporting the decision to approve the acquisition of securities in an initial public offering or in a limited offering by an associated person of the Firm.
 - v. A record shall not be required for the following: (a) any transaction effected in an account over which neither ALPHA WEALTH FUNDS or any of its advisory representatives has direct or indirect influence or control; (b) any transaction in shares issued by a money market fund, shares issued by any open-end fund not under common control with the Firm; (c) bank certificates of deposit, commercial paper, or high quality short-term debt instruments; (d) a security that is a direct obligation of the United States, and (e) transactions effected pursuant to an automatic investment plan.
10. Written procedures, including this compliance manual and privacy policy, to supervise the activities of employees and associated persons that are reasonably designed to achieve compliance with applicable securities laws and regulations as well as any records documenting the Firm's annual review of such procedures.
11. Any internal control report.

12. **Political Contribution Recordkeeping**

If the Firm or an associated person of the Firm provides investment advisory services to a government entity and gives a gift, subscription, loan, advance or anything of value as a campaign contribution shall retain records of the following:

- i. The names, titles and business residence addresses of all general partners, managing members, executive officers of the Firm, any employees who solicit a government entity for the Firm, and any person who supervises such employees and any political action committee controlled by the investment adviser (collectively, "covered associates").
 - ii. All government entities to which the Firm provides or has provided investment advisory services in the past five years but not prior to September 13, 2010.
 - iii. All direct or indirect contributions made by the Firm or any of its covered associates to an official of a government entity.
 - iv. All direct or indirect contributions made by the Firm or any of its covered associates to a political party of a state or to a political action committee.
13. A list or other record of all accounts with respect to the funds, securities, or transactions of any client.
14. A copy of each Part 2 and Part 3 of Form ADV and each amendment or revision thereof, given or sent to any client, and a record of the dates that each copy of each Part 2 of Form ADV, and each amendment or revision thereof, was given, or offered to be given, to any client who subsequently becomes a client.

15. **Referral, Testimonial, and Endorsement Recordkeeping**

The Firm shall maintain records relating to compensated referral, testimonial, endorsement, and promoter arrangements as required under Rule 206(4)-1 and Rule 204-2, including, as applicable:

- i. Written agreements with promoters where required;
 - ii. Copies of required disclosure relating to compensation, conflicts of interest, and promoter status;
 - iii. Documentation of promoter due diligence and eligibility review;
 - iv. Records of compensation paid or provided; and
 - v. Documentation of the Firm's oversight of the arrangement.
16. A file containing all communications received or sent regarding any litigation involving the Firm of any associated person or employee, and regarding any customer or client complaint.
17. Written information about each advisory client that is the basis for making any recommendation or providing any investment

advice to the client.

18. A secure file or digital archive containing a copy of each document, other than any notice of general dissemination, that was filed or received from any State or federal agency or self-regulatory organization and that pertains to the Firm or its associated persons. The file shall contain all applications, amendments, renewal filings, and correspondence. ALPHA WEALTH FUNDS shall preserve these records for a period of not less than five years from the end of the fiscal year during which the last entry was made on such record, the first two years in the principal office of ALPHA WEALTH FUNDS and the business location from which the customer or client is being provided or has been provided with investment advisory services. Records may be stored electronically via a secure cloud-based system, provided that access is reliable, records are promptly retrievable, and the storage method meets all applicable SEC and state requirements for electronic recordkeeping.
19. Originals of all written communications received and copies of all written communications sent by ALPHA WEALTH FUNDS relating to the following: (i) any recommendation made or proposed to be made and any advice given or proposed to be given; (ii) any receipt, disbursement, or delivery of funds or securities; and, (iii) the placing or execution of any order to purchase or sell any security. Provided, however, that the investment adviser shall not be required to keep any unsolicited market letters and other similar communications of general public distribution not prepared by or for the investment adviser.
20. A list or other record of all accounts that identifies the accounts in which the adviser is vested with any discretionary power with respect to the funds, securities, or transactions of any client
21. All powers of attorney and other evidence of the granting of any discretionary authority by any client to ALPHA WEALTH FUNDS.
22. A copy in writing of each agreement entered into by ALPHA WEALTH FUNDS with any client, and all other written agreements otherwise relating to the advisers business as an investment adviser.
23. A file containing a copy of each notice, circular, advertisement, newspaper article, investment letter, bulletin, or other communication, including any communication by electronic media, that the adviser circulates or distributes, directly or indirectly, by the Firm together with all records required under Rule 204(2) relating to such advertisement..
24. A copy of each brochure and brochure supplement, each amendment or revision thereof that satisfies the requirements of Part 2 of Form ADV, any summary of material changes that satisfies the requirements of Part 2 of Form ADV, and a record of the dates that each brochure and brochure supplement, each amendment or revision thereof, and each summary of material changes not contained in the brochure was given, or offered to be given, to any client who subsequently becomes a client.
25. Documentation describing the manner used to compute managed assets under Item 4.E of Part 2A of Form ADV, if the method differs from the method used to compute regulatory assets under management in Item 5.F of Part 1A of Form ADV.
26. A memorandum describing any legal or disciplinary event listed in Part 2 of Form ADV and presumed to be material, if the event involved the investment adviser or any of its supervised persons and is not disclosed in the brochure or brochure supplement. The memorandum must explain the investment adviser's determination that the presumption of materiality is overcome, and must discuss the factors described in Item 9 of Part 2A of Form ADV or Item 3 of Part 2B of Form ADV.
27. A written acknowledgement from each client of receipt of the Firm's brochure or disclosure document
28. All accounts, books, internal working papers, and any other records or documents that are necessary to form the basis for or demonstrate the calculation of the performance or rate of return of any or all managed accounts or securities recommendations in any notice, circular, advertisement, newspaper article, investment letter, bulletin or other communication that the investment adviser circulates or distributes, directly or indirectly. Such records shall include, as applicable, custodial account statements, fund administrator reports, benchmark calculations, fee calculations, performance worksheets, supporting assumptions, methodologies, and any other documentation necessary to substantiate the performance. Provided, however, that, with respect to the performance of managed accounts, the retention of all account statements, if they reflect all debits, credits, and other transactions in a client's account for the period of the statement, and all worksheets necessary to demonstrate the calculation of the performance or rate of return of all managed accounts shall be deemed to satisfy the requirements of this paragraph.
29. Records which identify the name of the associated person providing investment advice as described in paragraphs 21 and 27 above or identify the physical address, mailing address, e-mail address, or telephone number of the business location where such investment advice is provided.
30. All records supporting all advertisements, including approvals, supporting documentation for performance claims, hypothetical performance criteria, testimonials, endorsements, third-party ratings, and other materials required under Rule 206(4)-1.
31. Records created or substantially assisted through approved artificial intelligence tools shall be subject to the same supervision, approval, and recordkeeping requirements as any other Firm communications.
32. If the Firm has custody or possession of securities or funds of any client, the Firm must retain:
 - i. A journal or other record showing all purchases, sales, receipts and deliveries of securities for such accounts and all other

debits and credits to such accounts.

- ii. A separate ledger account for each such client showing all purchases, sales, receipts and deliveries of securities, the date and price of each purchase and sale, and all debits and credits.
 - iii. Copies of confirmations of all transactions effected by or for the account of any such client.
 - iv. A record for each security in which any such client has a position, which record shall show the name of each such client having any interest in such security, the amount or interest of each such client, and the location of each such security.
 - v. A memorandum describing the basis upon which you have determined that the presumption that any person controlling or controlled by the Firm is not operationally independent has been overcome.
33. If the Firm has discretion over a client's portfolio, the Firm must retain:
- i. Records showing separately for each such client the securities purchased and sold, and the date, amount and price of each such purchase and sale.
 - ii. For each security in which any such client has a current position, information from which the Firm can promptly furnish the name of each such client, and the current amount or interest of such client.
34. If the Firm exercises proxy voting authority with respect to a client's securities, the Firm must retain:
- i. Copy of the Firm's proxy voting policies and procedures
 - ii. A copy of each proxy statement that the Firm receives regarding client securities.
 - a. The Firm may satisfy this requirement by relying on a third party to make and retain, on the investment adviser's behalf, a copy of a proxy or may rely on obtaining a copy of a proxy statement from the SEC's EDGAR system.
 - iii. A record of each vote cast by the Firm on behalf of a client.
 - a. An investment adviser may satisfy this requirement by relying on a third party to make and retain, on the investment adviser's behalf, a record of the vote cast.
 - iv. A copy of any document created by the Firm that was material to making a proxy voting decision on behalf of a client.
 - v. A copy of each written client request for information on how the adviser voted proxies on behalf of the client, and a copy of any written response by the Firm.

2.3 Electronic Mail Communications

In transmitting electronic mail ("email") communications, all ALPHA WEALTH FUNDS personnel should realize that, since these communications can be accessed by ALPHA WEALTH FUNDS at any time, there should be no expectation of privacy or confidentiality by Firm personnel with respect to these communications. ALPHA WEALTH FUNDS has the capability to access, review, copy, and print any messages sent, received, or stored on the e-mail system. Moreover, the Firm has the ability to access, review, copy, and print any messages which have been permanently deleted by Firm personnel. ALPHA WEALTH FUNDS reserves the right to access, review, copy, and print any message at any time, and, in turn, to disclose such messages to any party it deems appropriate, including the SEC and any other applicable regulatory bodies. Use of the Firm's email system by Firm personnel constitutes an individual's consent to the Firm's recording and monitoring of that individual's e-mail communications.

This policy applies to all Firm-approved electronic communication methods used to conduct Firm business, including email, messaging platforms, video conferencing platforms, customer relationships management systems, collaboration tools, and other electronic communication channels approved by the Firm. Business communications conducted through unapproved communication methods may violate the Firm's recordkeeping requirements and are prohibited unless specifically authorized by the CCO.

Use of ALPHA WEALTH FUNDS's email system to engage in any communications that are in violation of any State or federal law and/or are in violation of any Firm policy, including but not limited to transmission of defamatory, obscene, discriminatory, or harassing messages, pictures or images is strictly prohibited. ALPHA WEALTH FUNDS prohibits any and all forms of discrimination, including but not limited to discrimination based on age, race, gender, sexual orientation or religious or political beliefs. The use of the email system to discriminate on any or all of the aforementioned bases is inappropriate and strictly prohibited.

Employees are responsible for ensuring that all business communications are accurate, professional, and comply with the Firm's Code of Ethics, Privacy Policy, Marketing and Advertising policies, and all applicable securities laws and regulations.

ALPHA WEALTH FUNDS reserves the right (through, without limitation, content filtering software, computer checks by the CCO or their designee or third parties contracted by ALPHA WEALTH FUNDS) to intercept, monitor, review, copy, record, disclose or take such other necessary action on any and all email composed, distributed, received or stored using the email system. The CCO may, on a periodic basis, selectively review a random sample of ALPHA WEALTH FUNDS personnel emails transmitted over the Firm email system for compliance

with the policies articulated in this statement as well as the overall Firm compliance manual.

Electronic communications created using artificial intelligence or other automated technologies remain the responsibility of the employee sending the communication. Employees must review all AI-assisted communications for accuracy, completeness, and compliance prior to distribution and ensure such communications are retained in accordance with the Firm's recordkeeping policies.

2.4 Complaints and Complaint File

All written and verbal complaints received by employees should immediately be forwarded to the CCO. The original written complaint and copies of all letters and memoranda relating to the complaint will be retained in a special file titled Customer Complaints, with a copy of the complaint placed in the client's personal file.

In the event that a client files a written complaint or makes an inquiry that requires response and resolution, and if there was a portfolio manager of the Firm that was handling the account, it will be the CCO's responsibility to promptly discuss the substance of the matter with the client's portfolio manager. The CCO will document their review and disposition of the complaint by drafting a memo detailing notes of their review and conclusions. The original complaint and copies of all letters and memoranda relating to the complaint will be retained in a special file titled Customer Complaints, with a copy of the complaint placed in the client's personal file. It is the responsibility of the CCO to respond to each complaint promptly and to retain any subsequent correspondence from the client on the matter.

Any associate of ALPHA WEALTH FUNDS who receives any material verbal complaint from a client must immediately notify their supervisor of the nature of the complaint. The term "material" in this context means any matter that could adversely affect the reputation of ALPHA WEALTH FUNDS or has a potential likelihood of regulatory or legal action against ALPHA WEALTH FUNDS or any of our associates. Any doubt on the materiality of a complaint should be referred to the CCO for resolution. All complaints shall be documented regardless of whether they are ultimately determined to have merit.

2.5 Record Retention and Coding

The Firm maintains and preserves required records using secure, industry-standard cloud storage solutions. These systems support the Firm's operational needs and compliance obligations by ensuring records are created, stored, and accessed in a reliable and efficient electronic format.

The following practices are observed in connection with the Firm's recordkeeping systems:

1. **Indexing and Retrieval:** Records are organized and indexed in a manner that allows for the prompt retrieval of any specific document or record.
2. **Regulatory Access and Reproduction:** The Firm is prepared at all times to promptly produce and deliver legible, true, and complete copies of any required records in hard copy or electronic format to the SEC or other regulatory authorities upon request.
3. **Redundancy and Backups:** Records are backed up regularly to geographically diverse locations within the cloud storage infrastructure to ensure continuity and compliance with required retention periods.
4. **Security and Integrity:** The Firm employs comprehensive data security protocols, including encryption, access controls, and audit trails, to safeguard records from unauthorized access, loss, alteration, or destruction. Systems are regularly monitored to ensure compliance with cybersecurity best practices.
5. **Readability and Accessibility:** All stored records remain accessible and easily readable throughout the applicable retention period, using commonly available software tools.
6. **Periodic Testing:** The Firm will periodically test its ability to retrieve electronically stored records to confirm that records remain accessible, complete, and capable of being promptly produced in response to regulatory examinations, legal requests, or other business needs. Any material deficiencies identified during testing will be documented and remediated as appropriate.

2.6 Records to be Maintained Upon Termination

Registered investment advisers with the U.S. Securities and Exchange Commission (SEC) shall preserve for at least five years after the termination of the enterprise the partnership articles and any amendments thereto, articles of incorporation, charters, minute books, and stock certificate books of the Firm and of any predecessor.

Before ceasing to conduct or discontinuing business, the Firm shall arrange for, and remain responsible for, the preservation of all required books and records for the remainder of each applicable retention period specified by SEC Rule 204-2. The Firm shall promptly notify the SEC of the location where the books and records will be maintained, in accordance with applicable regulatory requirements.

3. BROKERAGE & TRADING PRACTICES

3.1 Best Execution & Brokerage Selection

As a fiduciary, ALPHA WEALTH FUNDS has a duty to obtain the best execution for all transactions it executes on behalf of each of its clients. Generally, the price at which the security is bought/sold and the charges associated with such transactions are indicative but not determinative of best execution. Therefore, the broker who charges the lowest possible rate is not necessarily the broker who provides the best execution.

Best Execution Policy

It is ALPHA WEALTH FUNDS' policy in selecting brokers to obtain "best execution" of transactions effected on behalf of its clients.

The Firm's policy is to obtain reasonable commission rates in cents per share traded and low minimum ticket charges. However, the Firm believes that, while commissions are an important variable, achieving the best execution on a securities trade is a holistic assessment. Also important are responsiveness of the executing broker, our assessment of the value of research received and "price improvements" on limit orders.

The Firm requests documentation outlining policies for achieving "best execution" from broker-dealers through whom the Firm places client orders. Relationships with brokers/dealers will be reviewed on an ongoing basis, and the Firm will conduct a best execution review no less than annually to evaluate execution quality, commissions or spreads, responsiveness, available services, and other factors to obtain best execution for clients.

Brokerage Selection

In selecting brokers to effect securities transactions, ALPHA WEALTH FUNDS will consider factors it deems relevant. As such, the Firm will execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under all the circumstances and, in selecting brokers, will consider all factors it deems relevant, including, but not limited to:

- clearance and settlement capabilities,
- quality of confirmations and account statements,
- the ability of the broker to settle the trade promptly and accurately,
- the financial standing, reputation and integrity of the broker-dealer,
- execution quality,
- operational reliability,
- technology and trading capabilities,
- the broker-dealer's access to markets, research capabilities, market knowledge, and any "value added" characteristics,
- ALPHA WEALTH FUNDS' past experience with the broker-dealer,
- ALPHA WEALTH FUNDS' knowledge of negotiated commission rates and spreads currently available, and
- ALPHA WEALTH FUNDS' past experience with similar trades.

ALPHA WEALTH FUNDS will periodically evaluate the performance of the brokers it uses and may change the brokers it uses from time to time. The Firm utilizes broker-dealers and custodians that have been approved by Firm management based upon the Firm's best execution review and operational due diligence. The Firm recognizes that different trading strategies, custodians, or account types may require the use of different executing brokers or counterparties. The Firm evaluates best execution based on the circumstances of each strategy and client rather than solely on commission rates or transaction costs.

3.2 Directed Brokerage

If a client directs ALPHA WEALTH FUNDS to use a particular registered representative or brokerage firm, such instructions must be in writing. The client may at any time change such instructions by giving written notice to the Firm. It is the responsibility of the Firm to advise the client in writing that as a result of such brokerage, the client may pay a higher brokerage commission than might otherwise be paid if ALPHA WEALTH FUNDS had been granted discretion to select a broker to handle the client's account. If a client directs the Firm to use a particular registered representative or brokerage firm, the client will be advised that the Firm may be unable to bunch, block, or aggregate their trades with those of other clients. The inability to bunch trades may result in the client's trades being executed at a price different from trades that are bunched and which may be less favorable.

3.3 Soft Dollar Transactions

Section 28(e) of the Securities Exchange Act of 1934 (the "1934 Exchange Act") provides a "safe harbor" for money managers who use their clients' commission dollars to purchase brokerage and research services. The safe harbor provides protections against claims that the money manager may have violated a fiduciary duty to its client if it does not pay the lowest possible commission but receives items from the broker-dealer in exchange for the direction of client commissions.

The elements that must be satisfied before a money manager can claim the protection of Section 28(e) are as follows:

1. The manager may only be supplied with “brokerage” or “research services.” In many instances, the determination of what constitutes brokerage and research is difficult.
2. The services must be “provided” by the broker-dealer. This means either that the services must be supplied directly by the broker-dealer, or, if supplied by a third party, the broker-dealer must agree with the third party vendor that the broker-dealer will be solely responsible for any payments due to the vendor. If the broker-dealer is unable to pay, the money manager must not be responsible.
3. The money manager must have investment discretion in placing the brokerage and selecting the investments.
4. The commissions paid must be reasonable in relation to the services provided.
5. Commissions must be used to purchase services. No principal or riskless principal transactions are permitted.
6. The brokerage placed must be for securities transactions. Commodities and futures transactions are not permitted.
7. If a research product or service has both research and non-research uses, only the research portion of the use is within the Section 28(e) safe harbor. An allocation will be made between the research and non-research functions, with the portion of the use of the service allocable to research being paid with commission dollars and the non-research portion being paid with ALPHA WEALTH FUNDS’ own money.

In addition to the above criteria, in order to “soft dollar” any services, the Firm must maintain appropriate records of its soft dollar transactions (e.g., purchase orders, and records of determination of mixed-used allocations and service valuations), ensure that overall best execution is being obtained and make appropriate disclosure to clients of the items that the Firm intends to soft dollar.

Absent special circumstances, all soft dollar arrangements entered into by the Firm will be in compliance with Section 28(e). The Firm discloses to clients any potential conflicts of interest or arrangements related to soft dollars.

ALPHA WEALTH FUNDS requires approval from the CCO prior to entering into any soft-dollar arrangement. The Firm does not currently participate in soft dollar arrangements. Should the Firm enter into such arrangements, they will comply with Section 28(e) and applicable disclosure requirements.

3.4 Purchasing Hot Issues

“Hot issue” securities are securities of a public offering which trade at a premium in the secondary market whenever shortly after the public offering.

Generally, FINRA rules prohibit a FINRA member from selling any hot issue to an officer, director, partner, employee, or agent of any FINRA member or broker-dealer, or to any account in which any of these persons have a beneficial interest. If ALPHA WEALTH FUNDS manages an account in which a FINRA member’s partners, directors, officers or employees have a beneficial interest (such as an employee’s IRA, or a pension or profit-sharing plan for a broker-dealer’s employees), that account also may not purchase a hot issue security.

It is ALPHA WEALTH FUNDS’s policy that no securities may be purchased in a public offering for any of its advisory clients.

3.5 Principal Trades

In a principal trade, an adviser or affiliate buys securities from or sells securities to a client, for the adviser’s or the affiliate’s own proprietary account. The CCO requires that clients receive disclosures about the nature of the transaction and consent to each principal transaction prior to completion of such principal trade. The disclosure and consent is good only for the particular transaction.

It is ALPHA WEALTH FUNDS’s policy not to engage in principal transactions for itself or any of its affiliates.

3.6 Agency Cross Transactions

In an agency cross transaction, a broker serves as the agent for both the buyer and the seller. In the unlikely event that such a situation arises, the adviser will report the situation to the CCO, who will receive written consent prior to the transactions and supervise the transaction for compliance with SEC Rule 206(3) to ensure that the best deal is given for the interests of all parties involved.

3.7 Order Allocations/Aggregation

Transactions for each client account are generally effected independently. However, when ALPHA WEALTH FUNDS decides to purchase or sell the same securities for several clients at approximately the same time, ALPHA WEALTH FUNDS may (but is not required to) aggregate such transactions. When doing so, ALPHA WEALTH FUNDS will aggregate and allocate orders only in a manner which ensures fairness to each advisory client.

Aggregation of transactions will only occur when ALPHA WEALTH FUNDS believes that such aggregation is consistent with the Firm’s duty to seek best execution and best price for clients, and is consistent with ALPHA WEALTH FUNDS’s advisory agreement with each client for which trades are being aggregated. Generally, aggregated transactions are averaged as to price and transaction costs and will be allocated among participating accounts in proportion to the purchase and sale orders placed for the account on any given day.

ALPHA WEALTH FUNDS provides investment advisory services to a number of different clients which have similar objectives. The following procedures should be followed whenever securities are purchased or sold in a block for several accounts and then allocated among the accounts:

1. The allocation procedure must be fair to all accounts. No account should be favored over another account unless reasons, consistent with the best interests of each account, are documented. All allocation costs should be shared on a pro rata basis based on a client's participation.
2. The Firm will aggregate orders only when it is consistent with both the duty to seek best execution and clients' Advisory Agreements;
3. All allocations should be made as soon as possible with pre-trade allocations the most desirable. An allocation decision should never be delayed until the day after securities are purchased or sold in a block without the approval of the CCO.
4. In order to permit a review by the CCO of allocation decisions, order tickets should be time stamped when the order is placed, when the order is filled, and when the order is allocated to individual accounts. ALPHA WEALTH FUNDS will maintain accurate records for each client account in the aggregated trade of securities held by, bought and sold for that account.
5. ALPHA WEALTH FUNDS will not receive additional compensation as a result of an aggregated trade.
6. The CCO shall establish specific written procedures for the bunching of securities transactions of clients. Special procedures are necessary when bunching client transactions with those of ALPHA WEALTH FUNDS employees.

In some cases, certain client accounts may be excluded from aggregated block trades due to legal or regulatory concerns, or client restrictions. Deviations from the Firm's standard allocation methodology shall be documented, reviewed by the CCO when appropriate, and maintained with the Firm's trading records.

3.8 Trade Errors

At no time will ALPHA WEALTH FUNDS's clients be disadvantaged by trade errors. All errors in client accounts will be recorded and resolved in the client's favor as soon as practicable.

The Firm's policy is that when a trading error occurs, a client must be made whole. The Firm has established an error account through which it affects error correction procedures with respect to clients' accounts.

Trading errors often involve the purchase or sale of the wrong securities, or the correct securities in the wrong amount. When an account receives the wrong securities, the securities must be reallocated to the correct account at the trade date price. If an account is under-allocated securities in a purchase transaction, the order should be completed as soon as reasonably practicable at the price at which the original securities were purchased. If an account is over-allocated securities in a purchase, and the portfolio manager determines that it would be suitable for the other accounts participating in the order to purchase additional securities, the over-allocated securities may be reallocated among other accounts at the trade date price and in a manner consistent with the original allocation to those accounts. If, however, the portfolio manager determines that the over-allocated securities would not be suitable for the other accounts, then the over-allocated portion must be sold into the market. If that sale results in a gain, the sale will be effected from the account, and the gain belongs to the account; if the sale results in a loss, the sale will be effected from the Firm error account, which will absorb the loss.

ALPHA WEALTH FUNDS will maintain a list of trading errors relating to client accounts. The list will detail the transaction date of the trading errors, securities involved, broker-dealer involved, and a summary of the error and its solution. If any financial disbursements were to the client or to ALPHA WEALTH FUNDS as a settlement of the trading error, they will be disclosed detailing the amount in the list of trading errors relating to client accounts. Material trade errors shall be reported promptly to the CCO, documented in the Firm's trade error log, and reviewed to determine whether changes to procedures or additional training are warranted.

Under no circumstances may soft dollars be used to correct errors. All reallocations due to trading errors must be documented, and the CCO must approve all reallocations. The CCO will periodically review the written log of trade errors.

4. CODE OF ETHICS

ALPHA WEALTH FUNDS has adopted a Code of Ethics designed to promote honest and ethical conduct, compliance with applicable securities laws, the protection of client interests, and the identification and management of conflicts of interest. The Code of Ethics includes:

- Standard of business conduct reflecting the firm's fiduciary obligations;
- Personal trading procedures including reporting and pre-approval of certain investments;
- Procedures for identifying and reporting conflicts of interest;
- Procedures for reporting suspected violations; and
- Annual acknowledgement for all supervised persons of the Code.

The Act generally does not impose restrictions on the types of securities that can be purchased for client accounts. However, the Firm will comply with its clients' investment guidelines and any restrictions such clients impose on the Firm's management of client assets.

There are potential conflicts of interest inherent in trading by investment advisory personnel at the same time that they are providing investment advice to their clients.

ALPHA WEALTH FUNDS has adopted a Code of Ethics to specify and prohibit transactions deemed to create conflicts of interest (or at least the potential for or the appearance of such a conflict), and to establish reporting requirements and enforcement procedures relating to personal trading by Firm personnel. The restrictions on trading by ALPHA WEALTH FUNDS personnel for their own accounts are described in the Code of Ethics and Insider Trading Policy. The Insider Trading Policy prohibits any employee from trading based on material nonpublic information and requires prompt reporting of any suspected misuse. The Code and Policy are attached to this Compliance Manual as [Appendix C](#).

ALPHA WEALTH FUNDS will observe high standards of commercial honor and just and equitable principles of trade in the conduct of business. ALPHA WEALTH FUNDS and its associated persons will act primarily for the benefit of the clients. ALPHA WEALTH FUNDS and its employees will refrain from the following practices:

- Unsuitable recommendations
- Improper use of discretionary authority
- Excessive trading
- Unauthorized trading
- Borrowing money from or loaning money to a client
- Misrepresenting qualifications, services, or fees.
- Failure to disclose the source of a report or recommendation
- Charging unreasonable fees
- Failure to disclose conflicts of interest
- Guaranteeing performance
- Misuse of material nonpublic information
- Front-running or trading ahead of client transactions
- Misappropriation of client opportunities
- Circumventing Firm compliance policies or supervisory procedures
- Acceptance or giving of gifts and entertainment in violation of the Firm policy
- Failure to protect confidential or nonpublic client information or Firm confidential information
- Taking custody of client funds or assets without complying with the custody safekeeping requirements under Rule 206(4)-2 of the Advisers Act
- Entering into an improper advisory contract

Employees remain responsible for ensuring that the use of Firm-approved technology, including artificial intelligence tools, complies with the Code of Ethics, the Firm's confidentiality obligations, and all applicable Firm policies.

5. CUSTODY OF CLIENT FUNDS & SECURITIES

5.1 Compliance with SEC Custody Rule

Pursuant to Rule 206(4)-2 of the Investment Advisers Act of 1940 (the "Custody Rule"), an adviser is deemed to have custody of client funds or securities if it holds, directly or indirectly, client funds or securities, or has any authority to obtain possession of them. Custody includes:

1. Possession of client funds or securities (but not of checks drawn by clients and made payable to third parties) unless the Firm receives them inadvertently and they are returned to the sender promptly but in any case within three business days of receiving them;
2. Any arrangement (including a general power of attorney) under which the Firm or a supervised person is authorized or permitted to withdraw client funds or securities maintained with a custodian upon instruction to the custodian; and
3. Any capacity (such as general partner of a limited partnership, managing member of a limited liability company or a comparable position for another type of pooled investment vehicle, or trustee of a trust) that gives the Firm or supervised person legal ownership of or access to client funds or securities.

As an SEC-registered investment adviser, the Firm complies with the Custody Rule under Rule 206(4)-2 of the Investment Advisers Act of 1940. To the extent Utah law imposes additional requirements that apply to SEC-registered firms or their supervised persons, the Firm will ensure compliance with such requirements where applicable.

The Firm is deemed to have custody in two circumstances:

1. Fee deduction authority: ALPHA WEALTH FUNDS is authorized, through client agreements, to deduct advisory fees directly from client accounts held at qualified custodians. This limited authority constitutes custody under the Custody Rule and is

addressed in Section 5.2.

2. General partner of a pooled investment vehicle: ALPHA WEALTH FUNDS serves as the general partner of pooled investment vehicles and is thereby deemed to have custody of the Fund's assets. This is further addressed in Section 5.3.

In all cases, the Firm seeks to minimize actual possession of client assets. Employees must never accept physical custody of client funds or securities. If any supervised person inadvertently receives client funds or securities, they must notify the Chief Compliance Officer (CCO) immediately and arrange for the return of such assets within three business days. The CCO will document the event in the client file, including steps taken to return the asset.

All client assets must be maintained with a qualified custodian, such as a bank or broker-dealer, in accordance with the Custody Rule. Qualified custodians must send statements directly to clients at least quarterly.

The Firm discloses its custody practices in Form ADV and ensures all applicable safeguards, disclosures, and procedural requirements under Rule 206(4)-2 are followed.

Qualified Custodians

All funds and securities of client portfolios must be maintained with a "qualified custodian" (as defined under the Custody Rule). The term "qualified custodian" includes banks, savings associations, registered broker-dealers, and registered futures commission merchants (commodities brokers) and certain foreign institutions.

The qualified custodian will send the client a quarterly statement showing all account activity. A qualified custodian must be selected prior to the receipt of any cash proceeds from clients. The Firm will utilize qualified custodians that satisfy the requirements of Rule 206(4)-2 and are approved in accordance with Firm policies. If the qualified custodian (or transfer agent for mutual fund shares) is a Related Person of the Firm, then the qualified custodian must provide an internal control report to the Firm in accordance with the Custody Rule.

5.2 Direct Fee Deduction

The Firm is deemed to have custody by having fees directly deducted from client accounts held by a qualified custodian. In such cases, the Firm shall comply with each of the following requirements in addition to the above requirements:

- **Written authorization:** The investment adviser shall obtain prior written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
- **Custodian statement delivery:** The Firm relies on the qualified custodian to send account statements directly to clients, no less frequently than quarterly. These statements reflect the deduction of advisory fees and provide sufficient detail for clients to identify the amount and timing of each fee deduction. Clients are encouraged to review the custodial account statements to verify the accuracy of fee deductions and contact the Firm with any questions.
- **Notice of safeguards:** The Firm discloses its custody status in Form ADV, and the investment adviser intends to use the safeguards specified as detailed in Section 5.4.
- **Waiver of surprise audit requirement:** Because the Firm's custody is limited to fee deduction and the qualified custodian delivers statements directly to clients, the Firm is not required to undergo a surprise examination under Rule 206(4)-2.

5.3 General Partner Role in a Pooled Investment Vehicle

ALPHA WEALTH FUNDS serves as the general partner of a pooled investment vehicle (the "Funds") and is therefore deemed to have custody of the Fund's assets under Rule 206(4)-2 of the Investment Advisers Act of 1940 (the "Custody Rule"). As general partner, the Firm has authority over the Funds assets, which constitutes custody under the Custody Rule.

To comply with the Custody Rule, the Firm follows the audit exception for pooled investment vehicles, as permitted by the rule, in lieu of undergoing an annual surprise examination. Specifically:

1. Annual Financial Audit: The Fund is audited on an annual basis by an independent public accountant that is registered with and subject to regular inspection by the Public Company Accounting Oversight Board (PCAOB).
2. Distribution of Audited Financial Statements: The audited financial statements are prepared in accordance with U.S. generally accepted accounting principles (GAAP) and are distributed to all investors in the Fund within 120 days of the Fund's fiscal year-end. (Note: if the Fund is a fund-of-funds, financials will be delivered within 180 days.)
3. Engagement Terms: The accounting firm engaged to perform the audit is appointed via a written agreement and remains

independent of ALPHA WEALTH FUNDS and its affiliates.

4. Notice on Form ADV: The Firm discloses on Form ADV Part 1 that it has custody of client assets and relies on the annual audit exception with respect to the Fund. The Fund is identified in Section 9 of Schedule D, and the Firm affirms reliance on the audit exemption under Item 9.A of Part 1A of Form ADV.

In addition to the above, the Funds assets are maintained with a qualified custodian, and investors receive periodic statements from that custodian showing the assets and transactions in the Funds accounts. The CCO will periodically review the status of the annual audit, financial statement distribution, and Form ADV custody disclosures to ensure continued reliance on the audit exception under Rule 206(4)-2.

If a pooled investment vehicle relying on the audit approach is liquidated prior to its fiscal year-end, the Firm will coordinate a final audit upon liquidation and distribution of audited financial statements to investors in accordance with the Custody Rule.

ALPHA WEALTH FUNDS maintains appropriate records related to its custody of client assets and ensures timely coordination, with the accounting firm and legal counsel, to meet all compliance requirements under the Custody Rule. The Firm coordinates with the Fund administrator, independent auditor, legal counsel, and qualified custodians to satisfy the Custody Rule and applicable private fund compliance requirements.

5.4 Firm Custody Procedures

ALPHA WEALTH FUNDS may be deemed to have custody arising from the automatic deduction of advisory fees from client advisory accounts and serving as general partner (or equivalent) of one or more pooled investment vehicles.

Generally, however, ALPHA WEALTH FUNDS does not permit employees or the Firm to accept or maintain custody of client funds and/or assets. It is the Firm's policy that all client funds and securities must be held in the name of the client (or the pooled investment entity) at a qualified custodian, such as a bank or broker-dealer, who is independent of the Firm.

This policy relates to the **handling of client funds and/or securities**. It is the expressed policy of ALPHA WEALTH FUNDS that the Firm will not take physical custody of client funds or securities. Avoidance of custody will be accomplished through the following procedures:

1. **Certificates**: Should a certificate for any security be received into the offices of ALPHA WEALTH FUNDS through the mails or other delivery service, such certificate shall be immediately, and on the same date of receipt, taken to the custodian.
2. **Checks**: Employees of ALPHA WEALTH FUNDS are prohibited from ever holding customer funds or securities in any capacity as custodian for a client account. Receipts of checks and payment of funds will be recorded promptly by the CCO in the Firm's check register or similar journal. Checks made payable to an account custodian must be forwarded to the account custodian for deposit to a client account within 24 hours of when it was received. Employees should never accept possession of client securities for safekeeping, or hold client checks in excess of three business days pending pick up by the client.

In the event that an employee of ALPHA WEALTH FUNDS receives funds, securities, or other assets from a client, such employee must immediately notify the CCO and arrange to return such funds, securities, or other assets to the client within 3 business days of receiving them. The CCO will prepare a memo for the client file, documenting the event and its resolution and include a copy of the letter sent to the client explaining the reason for the return of the assets.

3. **Qualified Custodians**: All accounts are maintained with a qualified custodian, directly under the client's name or the name of the pooled vehicle. This qualified custodian provides statements directly to the client or his or her independent representative on at least a quarterly basis.
4. **Surprise Examinations**: If the Firm has custody and does not qualify for an available exemption, the Firm will engage an independent public accountant to perform surprise examinations of client funds and securities in accordance with the Custody Rule.
5. **Employee Restrictions**: Firm personnel are prohibited from:
 - a) Having signatory power over any client's checking account;
 - b) Having the power to unilaterally wire funds from a client account;
 - c) Physically holding cash or securities of any client;
 - d) Receiving the proceeds from the sale of client securities or interest or dividend payments made on a client's securities or check payable to the Firm except for advisory fees;
 - e) Having general power of attorney over a client's assets;
 - f) Holding client's assets with an affiliate of ALPHA WEALTH FUNDS where the Firm, its employees, or officers have unrestricted access to advisory clients assets;
 - g) Borrowing money or securities from any ALPHA WEALTH FUNDS client;
 - h) Having authority to change client banking instructions;
 - i) Having authority to redirect distributions;

- j) Having authority to add themselves as an authorized party; or
 - k) Lending money to any client, unless approved in writing by the CCO.
6. **Books and Records:** Pursuant to Rule 204-2, should the Firm ever be deemed to have custody, the records required to be made and kept shall include the following:
- a) A journal or other record showing all purchases, sales, receipts, and deliveries of securities, including certificate numbers, for all accounts and all other debits and credits to the accounts.
 - b) A separate ledger account for each client showing all purchases, sales, receipts and deliveries of securities, the date and price of each purchase and sale, and all debits and credits.
 - c) Copies of confirmations of all transactions effected by or for the account of any client.
 - d) A record for each security in which any client has a position that shows the name of each client having any interest in each security, the amount or interest of each client, and the location of each security.

All records related to the operation and management of ALPHA WEALTH FUNDS are required to be made and kept for a period of not less than five years from the end of the fiscal year during which the last entry was made on such record. For at least the first two years, these records must be maintained in a format that allows for prompt production and retrieval, and must be accessible from the Firm's principal office or another SEC-compliant business location. All records may be maintained in electronic format, provided that they are secured, backed up, and indexed in a manner that complies with Rule 204-2 under the Advisers Act. The Firm uses encrypted cloud-based systems with access controls to meet this requirement. All documents must be readily accessible for inspection by the SEC, and capable of being reproduced in hard copy promptly upon request.

6. EMPLOYEES

6.1 Employee Screening

ALPHA WEALTH FUNDS will not knowingly hire or become associated with any person who may be ineligible to be associated with a registered investment adviser. Such persons would include, for example, those convicted of certain criminal violations or those enjoined from employment in the securities industry. With any prospective employee, ALPHA WEALTH FUNDS will seek background information from the applicant and other materials as appropriate under the circumstances. The CCO, or their designee, will coordinate the Firm's pre-employment screening process and verify that required background reviews have been completed prior to the employee providing advisory services. Background reviews may include review of Form U4/U5 (if applicable), IARD filings, reference checks, employment history verification, and a review of disciplinary history through the Investment Adviser Public Disclosure (IAPD) system and/or FINRA's BrokerCheck.

Notably, an application for registration may be denied, suspended, or revoked if the applicable regulatory authority finds that the person has been convicted of any felony, or of a misdemeanor offense that directly relates to its duties and responsibilities.

6.2 Employee Solicitations

An employee soliciting clients for the Firm must not be subject to any statutory disqualification under Rule 206(4)-1 (the "Marketing Rule"), must disclose to the client their affiliation with the Firm, and must enter into a written agreement with the Firm, which the CCO will provide to prospective solicitor-employees. The Firm will confirm that any employee who solicits clients is not an ineligible person as defined under Rule 206(4)-1(e)(4) due to disciplinary or legal history. If an employee is required to register as an investment adviser representative under any applicable state law, the Firm will ensure that such registration is obtained prior to soliciting any clients in that jurisdiction. Employees must use only Firm-approved marketing materials and communications when soliciting prospective clients.

6.3 Compliance Oversight Responsibilities

The CCO is responsible for implementing and administering the Firm's compliance program, conducting periodic compliance testing and monitoring, coordinating the annual compliance review, overseeing regulatory filings, reviewing advertising and marketing materials as required by Firm policy, investigating potential issues, and implementing corrective actions where appropriate.

6.4 Compliance Training

All supervised persons of ALPHA WEALTH FUNDS are required to complete compliance training upon hire and participate in periodic training thereafter. Training covers key regulatory obligations, the Firm's Code of Ethics, personal trading rules, and policies on privacy and cybersecurity. Supervised persons are expected to understand and adhere to these policies as a condition of employment. Training may include, as applicable:

- Code of Ethics
- Insider Trading

- Privacy and Cybersecurity
- Marketing Rule requirements
- Electronic Communications
- Personal Trading
- Anti-Fraud Obligations
- Conflicts of Interest
- Books and Records
- New Regulatory Developments

Each supervised person shall certify, at least annually, that they have received, reviewed, understand, and will comply with the Firm's Compliance Manual, Code of Ethics, and other required compliance policies. Employees are also responsible for promptly reporting any known or suspected violations of Firm policy or applicable securities laws to the CCO.

6.5 Continuing Education

ALPHA WEALTH FUNDS encourages all supervised persons to maintain current knowledge of applicable securities laws, regulatory developments, industry best practices, and the Firm's policies and procedures. Where continuing education is required by applicable federal or state law, rule, or professional designation, supervised persons are responsible for completing such requirements in a timely manner and providing evidence of completion to the Firm upon request. The CCO will periodically monitor applicable regulatory requirements and notify affected personnel of any mandatory continuing education obligations.

6.6 Remote Work

Employees approved to work remotely remain subject to all Firm policies and supervisory procedures. Remote work locations must maintain appropriate safeguards to protect confidential information, Firm records, and client information, including compliance with the Firm's cybersecurity and electronic communications policies.

7. FILINGS & REPORTS

7.1 Annual Amendments

The Firm is responsible for maintaining all required SEC registrations, state notice filings, and associated person registrations. Each year, the Firm shall complete the Investment Adviser Registration Depository ("IARD") renewal process, including the timely payment of all applicable renewal fees, to maintain the Firm's registrations and notice filings.

The Firm shall file an annual updating amendment to Form ADV within 90 days after the end of its fiscal year. The CCO is responsible for coordinating the annual review of Form ADV and ensuring that all required amendments, disclosures, and filings are completed accurately and filed on a timely basis.

In addition to the annual updating amendment, the Firm shall promptly amend its Form ADV whenever information becomes materially inaccurate, as required by the Investment Advisers Act of 1940 and applicable SEC rules. The CCO shall determine whether an event or change requires an other-than-annual amendment and shall ensure that any required amendments are filed through the IARD system in a timely manner.

All supervised persons are responsible for promptly notifying the CCO of any actual or anticipated changes to their business activities, outside business activities, disciplinary history, conflicts of interest, contact information, or any other information that may require an amendment to Form ADV, Form CRS, Form U4, or any other regulatory filing.

7.2 Other Disclosures and Reports

ALPHA WEALTH FUNDS shall also disclose to clients and prospective clients any financial, legal or disciplinary event that is material to an evaluation of the Firm's integrity or ability to meet its contractual commitments to clients (which includes certain information with respect to a financial condition of the Firm or with respect to employees who have a disciplinary history). This information must be disclosed to clients before further investment advice is given to the clients. With respect to prospective clients, this information shall be disclosed at least 48 hours before entering into any written or oral investment advisory contract, or no later than the time of entering the contract if the client has the right to terminate the contract without penalty within five business days after entering into the contract. The CCO shall determine whether any material event requires revisions to the Firm's Form ADV, Form CRS, marketing materials, website disclosures, or other client communications. The CCO shall make the determination whether such an event requires disclosure and the manner of such disclosure.

7.3 Annual Financial Statements

As an SEC-registered investment adviser and in accordance with Rule 206(4)-2, ALPHA WEALTH FUNDS is not required to file an audited balance sheet solely due to having custody of client funds or securities (such as through direct fee deduction or serving as general partner to a

pooled investment vehicle), provided that the Firm does not require or accept prepayment of fees of more than \$1,200 per client, six months or more in advance.

If, in the future, the Firm requires such prepayment of fees, it must include an audited balance sheet in its Form ADV Part 2A and comply with the following requirements:

- The balance sheet must be audited by an independent certified public accountant;
- It must be prepared in accordance with generally accepted accounting principles (GAAP); and
- It must be accompanied by notes that describe the basis of preparation, the valuation of any securities or assets, and any other information necessary for clarity.

The CCO shall monitor the Firm's fee arrangements and billing practices and ensure compliance with all financial reporting obligations based on the Firm's activities.

7.4 State Registrations

ALPHA WEALTH FUNDS will monitor and maintain all appropriate Firm registration filings and associated person registrations that may be required for providing advisory services to our clients in any location. The CCO shall monitor client locations and associated person activities on an ongoing basis to determine whether additional state registration, notice filings, or investment adviser representative registrations are required. In addition, prior to the annual renewal period at calendar year end, the CCO will compare the home addresses for all clients to determine appropriate notifications and registrations for the Firm and any associated persons. The CCO shall document periodic reviews of Firm and associated person registration requirements and retain documents of any resulting filings or determinations. The CCO shall maintain an annual review log to confirm the above has been complied with, and shall document completion of the review in the annual log.

7.5 Registration Renewals

Registration renewals for the Firm and advisory representatives are paid via the Firm's IARD account. The IARD renewal statements become available on the system each year in early November. The deadline for payment is generally prior to the second week of December. Failure to pay a renewal fee in a timely manner may result in termination of the registration by the applicable regulatory authority.

7.6 Amendments to Form U4

All states that require registration of associated persons have mandated that associated persons file a Form U4. All employees who are registered as associated persons have a continuing obligation to amend and update information required by Form U4 as changes occur. Firm associated persons should report to the CCO any update promptly (**within no more than 10 days**) to the following items:

- (1) Professional designations
- (2) Identifying Information/Name Change
- (3) Residential History
- (4) Address Changes
- (5) Employment History
- (6) Other/Outside Businesses
- (7) Outside disciplinary matters
- (8) Any event which would lead to an affirmative answer to any disciplinary disclosure questions
- (9) Any other information that may require amendment to Form U4 or other regulatory filings.

Reporting changes in a timely manner to the CCO will ensure the Firm can file required U4 amendments within the 30-day deadline.

7.7 Regulatory Examinations

The CCO is responsible for coordinating responses to regulatory examinations, inquiries, deficiency letters, and requests for information from the SEC or other regulatory authorities. Employees shall promptly notify the CCO upon receipt of any regulatory correspondence relating to the Firm or its advisory activities and shall cooperate fully in responding to regulatory requests. The Firm will maintain records of examinations, correspondence, and corrective actions taken in response to regulatory findings.

8. FINANCIAL & DISCIPLINARY INFORMATION

8.1 Financial Disclosure

ALPHA WEALTH FUNDS must disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. This includes but is not limited to:

- Bankruptcy filings,
- Insolvency, or
- Other significant financial difficulties.

The CCO is responsible for determining whether any such financial condition exists and for ensuring that the appropriate disclosure is made in Form ADV Part 2A and communicated to clients as required. The CCO is responsible for monitoring potential financial disclosure events, determining whether disclosure is required under the Advisers Act and Form ADV, and ensuring that any required disclosures are made promptly and accurately.

8.2 Disciplinary Disclosure

ALPHA WEALTH FUNDS shall disclose all legal or disciplinary events that are required to be disclosed under Form ADV and that are material to a client's or prospective client's evaluation of the Firm's integrity or ability to meet its contractual commitments. Any required disciplinary disclosures are to be reported on the appropriate sections of ADV Part 1A (Disclosure Reporting Pages) and, if applicable, Form ADV Part 2A (Brochure), for ALPHA WEALTH FUNDS. It is the responsibility of the CCO to ensure that any disciplinary information requiring disclosure is promptly and accurately reported through the IARD system.

All supervised persons are responsible for promptly notifying the CCO of any criminal charge, regulatory investigation, civil action, bankruptcy, customer complaint, arbitration, or other event that may require disclosure or regulatory reporting. The CCO will determine whether the event required amendment to Form ADV, Form U4, Form CRS, or other regulatory filings. The types of disciplinary events that must be disclosed include, but are not limited to:

1. Criminal or civil actions, where the adviser or a management person of the adviser was convicted, pleaded guilty or "no contest," or was subject to certain disciplinary actions with respect to:
 - a) Investment-related businesses, statutes, regulations, or activities;
 - b) Fraud, false statements, or omissions;
 - c) Wrongful taking of property; or
 - d) Bribery, forgery, counterfeiting, or extortion.
2. Administrative proceedings before the SEC, other federal regulatory agencies, or any state agency where:
 - a) the Firm's or management person's conduct were found to have caused an investment-related business to lose its authorization to do business, or
 - b) a person was involved in a violation of an investment-related statute or regulation and was the subject of specific disciplinary actions taken by the agency.
3. Self-regulatory organization (SRO) proceedings in which:
 - a) The Firm or a management person was found to have caused an investment-related business to lose its authorization to do business, or
 - b) Was found to have been involved in a violation of the SRO's rules and was the subject of specific disciplinary actions taken by the organization.

The CCO will maintain procedures reasonably designed to identify financial or disciplinary events requiring disclosure and will promptly update its regulatory filings and client disclosure as required by applicable law. The CCO will periodically review the Firm's disclosure obligations as part of the Firm's ongoing compliance program and annual compliance review. The Firm will also evaluate whether any financial or disciplinary event involving a supervised person requires updates to marketing materials, websites, or other public disclosures maintained by the Firm.

9. FORM ADV & BROCHURES DELIVERY

9.1 Form ADV

With respect to the ADV, material inaccuracies should be considered as those facts or information which a client or prospective client would consider important in their decision to engage ALPHA WEALTH FUNDS for advisory services. All employees should report to the CCO any information in the Form ADV and/or the Disclosure Documents that such employee believes to be materially inaccurate or omits material information.

It is important that Form ADV contains current and accurate information. In addition to the *annual updating amendment*, the Firm shall promptly amend its Form ADV by filing additional amendments (known as: other-than-annual amendments) whenever it becomes materially inaccurate or when otherwise required by applicable SEC rules. The CCO is responsible for determining whether an event requires an other-than-annual amendment and for ensuring timely filing through the IARD system. Material changes may include, but are not limited to:

Information about the Firm that was provided in response to the following Items becomes inaccurate IN ANY WAY:

<i>Item Number</i>	<i>Description</i>
Item 1 of Part 1A	Identifying Information
Item 3 of Part 1A	Form of Organization
Item 9 of Part 1A	Custody
Item 11 of Part 1A	Disclosure Information
Item 1 of Part 1B	State Registration
Items 2A through 2F of Part 1B	Additional Information: (Contact Info/Bond/Judgments & Liens/Arbitration/Civil Judicial Action)
Item 2I of Part 1B	Additional Information: Custody

Information provided about the Firm in response to the following items becomes MATERIALLY inaccurate:

<i>Item Number</i>	<i>Description</i>
Item 4 of Part 1A	Successions
Item 8 of Part 1A	Participation or Interest in client Transactions
Item 10 of Part 1A	Control Persons
Items 2A through 2G of Part 1B	Other Business Activities

All supervised persons are responsible for promptly notifying the CCO of any actual or anticipated changes that may require updates to Form ADV, Form CRS, Form U4, marketing materials, or other regulatory disclosures. The CCO will maintain all current and prior versions of the Firm's Form ADV, copies of all amendments and supporting documents. The CCO shall periodically review the Firm's website, marketing materials, client agreements, and other public disclosure to help ensure consistency with the information contained in Form ADV and Form CRS.

9.2 Parts 2A, 2B and 3 of Form ADV/Written Disclosure Documents

ALPHA WEALTH FUNDS clients are entitled to receive full and fair disclosure regarding the Firm, its services, fees, conflicts of interest and qualifications. To fulfill this obligation, ALPHA WEALTH FUNDS provides disclosure documents in compliance with SEC Form ADV requirements, specifically Part 2A, 2B, and 3. An investment adviser is required to deliver documents to each client:

- Part 2A of Form ADV ("Firm Brochure") contains narrative information about ALPHA WEALTH FUNDS business practices, fees, conflict of interest, disciplinary information, and other material facts. This brochure must be:
 - Provided to prospective clients before or at the time of entering into an advisory agreement. If the brochure is delivered at the time of contract signing, the client must be given a right to terminate the agreement without penalty within five business days

- Each year, the Firm will deliver or offer to deliver the current brochure, together with a summary of material changes if required, in accordance with applicable SEC requirements. Offered or delivered to existing clients, either by sending the updated brochure or offering it and making it available upon request, free of charge
 - Updated and delivered promptly if any material changes occur that affect the content of the brochure
2. Part 2B of Form ADV (“Brochure Supplement”) provides information about the specific supervised persons who provide investment advice to clients including: educational background, business experience, disciplinary history, other activities and compensation, and supervision. The Brochure Supplement must be delivered to the client at or before the time the supervised person begins providing advisory services.
 3. Part 3 of Form ADV (“Customer Relationship Summary” or “Form CRS”) is a brief, plain-language disclosure document for registered investment advisers that serve retail investors. It outlines the types of client relationships, fees, costs, conflicts of interest, standard of conduct, and disciplinary history. ALPHA WEALTH FUNDS must:
 - Update and file Form CRS with the SEC within 30 days of any material change
 - Deliver Form CRS to each new retail investor before or at the time of entering into an investment advisory agreement
 - Communicate material changes by delivering the amended Form CRS to existing retail investors within the timeframe required by SEC rules.

ALPHA WEALTH FUNDS shall maintain documentation evidencing the delivery of all required disclosure documents in accordance with SEC requirement. The Firm’s current standard Advisory Agreement can be obtained from the CCO.

Proof of delivery of ALPHA WEALTH FUNDS Part 2 and Part 3 may be evidenced by the client’s signed advisory agreement, electronic delivery records, acknowledgement through the Firm’s document management system, or other documentation demonstrating timely delivery. A copy of the written agreement and all attachments will be maintained in the customer file.

The Firm will annually deliver or offer to deliver its current Form ADV Part 2A Firm Brochure to existing clients in accordance with applicable SEC requirements and will maintain documentation of such delivery or offer.

Copies of the Firm’s current statements may be obtained from the CCO.

The CCO is responsible for coordinating preparation, review, filing, delivery, and record retention relating to all Form ADV components, including monitoring for events that may require amendments.

9.3 Description of the Code of Ethics

The Firm’s Form ADV Part 2A includes a summary of the Firm’s Code of Ethics as required by SEC rules. A complete copy of the Code of Ethics will be provided to any client or prospective client upon request.

10. PORTFOLIO MANAGEMENT

10.1 Setting Up Client’s Account

For its managed account program, the Firm should interview prospective clients to discuss the various advisory services available through ALPHA WEALTH FUNDS and assist the client in selecting the advisory services appropriate for that client’s investment needs. The Firm will provide required Form ADV Part 2 and Form CRS disclosure to prospective clients at the times required under applicable SEC rules and the Firm’s disclosure-delivery procedures. The Firm will also obtain all supporting documents necessary to set up the account. With respect to joint accounts, the Firm will confirm that all parties to the account for whom advisory services are being provided have signed the client Agreement.

No trading may occur until the Advisory Agreement has been fully executed, all required account documentation has been completed, and discretionary authority has been properly granted where applicable. Executed account documentation will be reviewed by the CCO as soon as practicable following account establishment. Any deficiencies identified during the review shall be promptly corrected and documented.

Discretionary Trades for securities may be entered for execution only if ALPHA WEALTH FUNDS has received prior written authorization from the client for such transactions. Evidence of the Firm’s authority to manage the client’s account on a discretionary basis will be documented by the Advisory Agreement.

All written authority granted to ALPHA WEALTH FUNDS by the client will be restricted to “limited trading authority”, giving the Firm the power to only purchase and sell securities for the account. At no time will ALPHA WEALTH FUNDS or any of its associates enter into any written or verbal agreement or understanding with a client that gives the associate “full trading authority” over the account since that term may be interpreted as granting authority to withdraw funds and securities from the client’s account.

10.2 Determining Suitability

ALPHA WEALTH FUNDS has a fiduciary duty to provide advice that is in the best interest of its clients based on the client’s investment

objectives, financial circumstances, risk tolerance, liquidity needs, time horizon, and any other information reasonably obtained through the advisory relationship.

The Firm shall not recommend the purchase, sale, or exchange of any security, or implement an investment strategy, without a reasonable basis to believe that the recommendation or strategy is appropriate based upon the information obtained from the client through reasonable inquiry and ongoing communications.

In setting up an account, the associated person should obtain basic investment information about the prospective client and maintain a record of such information. The firm uses a risk profile suitability questionnaire and other client information to determine the appropriateness of its advisory recommendations.

The CCO will conduct periodic, risk-based reviews of client accounts to assess compliance with the Firm's policies and procedures and to determine whether account activity appears consistent with the client's documented investment objectives and risk profiles. Any material concerns identified during these reviews will be discussed with the associated person responsible for the account, and appropriate corrective action will be taken when necessary.

If the Firm becomes aware that a client's investment objectives or financial circumstances have materially changed, updated documentation should be obtained before implementing recommendations that rely upon the changed information.

For client-directed transactions that are materially inconsistent with the client's documented investment objectives, the CCO may require that the client execute a written acknowledgement confirming that the transaction is being made at the client's direction despite the inconsistency with the Firm's recommendations. Such documentation shall be retained in the client file.

10.3 Managing the Client's Account

It is the associated person's responsibility to keep informed of any changes in their client's financial situation. In managing accounts, each associated person is required to maintain regular communications with their clients. Associate persons should maintain regular communications with their clients throughout their advisory relationship. At a minimum these communications will include the following:

1. Advisory personnel are responsible for making reasonable efforts to maintain current client information, including investment objectives, financial circumstances, risk tolerance, liquidity needs, and any material changes relevant to the advisory relationship. Client records shall be updated whenever the Firm becomes aware of material changes.
2. At least annually, advisory representatives will undertake a comprehensive review of each of their accounts to assess the client's financial situation and individual investment needs. In addition, each portfolio manager should evaluate the portfolio if they should become aware of any changes in any client's investment objectives or financial circumstances as shown in the client documentation. All updated information will be maintained in the client's files. The associated persons will maintain a log to ensure that all client accounts are reviewed at least on an annual basis.
3. In addition to the daily review of executed and unexecuted order memoranda, the CCO will conduct periodic, risk-based reviews of selected client accounts to assess compliance with the Firm's policies and procedures. Any material concerns identified during these reviews will be discussed with the associated person responsible for the account, and appropriate corrective action will be documented when necessary.
4. ALPHA WEALTH FUNDS will ensure that the qualified custodians of the clients in the Firm's managed account program will provide each client with a quarterly statement of the account. Clients are encouraged to compare custodial statements with any account information provided by the Firm and promptly report any discrepancies. It is the responsibility of each portfolio manager to keep their clients apprised of relevant changes in the economy, market conditions, and about ALPHA WEALTH FUNDS investment views and expectations for the economy and the markets.

The CCO shall prepare a memo to document the accounts that were reviewed for the above criteria, and note any deficiencies that were found.

10.4 Monitoring Account Activity

After an account has been approved for a specific investment program, the Firm will monitor the trading activities in the account to ensure that the securities purchased or sold are consistent with the client's investment objectives. The Firm will also look for any evidence of excessive trading or conflicts of interest with the client. Monitoring activities also include review for excessive trading, conflicts of interest, unusual trading patterns, trade errors, and other activity that may require supervisory review.

The Firm is not permitted to enter any order for the purchase or sale of securities for any non-discretionary account without first consulting with and receiving the client's approval for such transaction.

Should there be an employee of the Firm found to have committed serious or repeat violations of the conduct described in the above sections, that person will be referred to the CCO for potential disciplinary action, up to and including termination.

10.5 Investment Restrictions

The Firm will comply with its client's guidelines and any restrictions or limitations such clients impose on the Firm's management of client assets. The Firm also has an obligation to disclose the effects of such restrictions or limitations (to the best of the Firm's knowledge) to the clients who request them.

10.6 Portfolio Disclosure Obligations – Five percent Positions

With large positions, ALPHA WEALTH FUNDS personnel generally should adhere to the following guidelines.

1. Contact the CCO when the Firm controls the voting or disposition of four percent of any class of voting stock. Federal securities law, including Section 13 of the Securities Exchange Act of 1934, imposes disclosure obligations on investors whose "beneficial ownership" exceeds five percent of a class of equity securities. The "beneficial owner" of a security is not necessarily the record owner but the "person" that exercises voting and/or dispositive control of the securities. To ensure that these questions are addressed in a timely manner, the CCO should be notified when any position reaches the four percent threshold.
2. Avoid entering into agreements with other investors with respect to actions relating to portfolio companies. If two or more investors agree to act in concert with respect to a particular company, then each member of the group is deemed to "own" all the securities held by each member of the group. At the very least, such a relationship imposes a complicated disclosure regimen. As a general rule, the Firm should maintain its independence. That does not mean that the Firm personnel cannot discuss the merits of portfolio companies with other investment professionals. It is important, however, that these conversations not end in agreements regarding a joint course of action.
3. Take no action to exercise control over a portfolio company. As a matter of general policy, the Firm will not seek operating control of the companies in which it directs investments. When the Firm's clients cumulatively take a large position in a company's voting securities, investment personnel should exercise particular caution to avoid any activities that could be viewed as an attempt to control the company. The Firm should not be seen to be directing management in the operation of the company's business nor mandating the activities of the company's authority of directors. Any proposed exception to this general policy, including situations involving significant ownership positions, board representation, or other governance rights, must be reviewed by the CCO prior to implementation to determine whether additional legal or regulatory requirements apply. Associated persons shall promptly notify the CCO if any of the above exceptions are contemplated.

10.7 Termination of Accounts

Every client has the right to terminate their advisory agreement with ALPHA WEALTH FUNDS at any time upon written notice. Any pre-paid advisory fees will be prorated to the date of termination and any unearned advisory fees will be promptly returned to the client. Advisory fees will be considered earned through the effective date of termination.

Upon the termination of any account, if the Firm employed a portfolio manager which handled that account, the portfolio manager will prepare a memo detailing the reasons for account termination. The Firm shall maintain documentation regarding account terminations, including the termination date, reason for termination (if known), any client concerns or complaints, and any follow-up actions taken by the Firm. The customer file will be forwarded to the CCO for review. The CCO should be aware of trends of account termination or any potential complaints and should call the customer to discuss if correspondence from the customer indicates any concerns. The CCO will maintain a log of all terminated accounts, including the name of the portfolio manager, account termination date and reason for termination.

11. PRIVACY OF CLIENT INFORMATION

11.1 Privacy Policy

As general policy, ALPHA WEALTH FUNDS will not disclose personal financial information about any client to nonaffiliated third parties except as necessary to establish and manage the client's account(s) or as required by law. In these situations, personal financial information about a client may be provided to the broker-dealer or other custodian maintaining these accounts.

In addition, ALPHA WEALTH FUNDS restricts access to a client's nonpublic personal financial information to those who need to know such information in order to provide products or services to clients. ALPHA WEALTH FUNDS maintains physical, electronic, and procedural safeguards that comply with federal standards to guard each client's personal financial information. Such safeguards include, among other things, restricting information contained on the Client Investment Questionnaire or in any client documentation supporting the written agreement to each client's personal account portfolio manager, the portfolio manager's supervisor, and the Firm's CCO or such other persons as the CCO deems as needing to know the information. Any hard copy of client personal financial information is secured (locked) when not in use and after normal business hours. Electronic records are stored in secure, password protected platforms with role-based access to client personal financial information. All systems require multi-factor authentication, where available, and data is backed up regularly.

The Firm maintains written policies and procedures reasonably designed to protect customer information, safeguard records containing nonpublic personal information, respond to incidents involving unauthorized access to customer information, and comply with Regulations S-P and other applicable privacy and cybersecurity requirements.

In the course of client relationships, ALPHA WEALTH FUNDS gathers and maintains personal, non-public information regarding its clients' financial circumstances and investment objectives. ALPHA WEALTH FUNDS is committed to maintaining the privacy and confidentiality of this client information. Accordingly, ALPHA WEALTH FUNDS has adopted a privacy policy in accordance with the SEC's Regulation S-P under the Gramm-Leach-Bliley Act privacy regulations which require investment advisers to determine and disclose how they treat nonpublic information about their clients and potential clients.

1. The Firm may collect nonpublic personal information about the Firm's clients and potential clients from the following sources:
 - a. Information received from account applications, written questionnaires, interviews/conversations, information forms and other client interactions;
 - b. Information about transactions with the Firm, any affiliates of the Firm, or others; and
 - c. Information the Firm obtains or receives from a consumer reporting agency.
2. All client information is to be maintained in the Firm's master client files and/or stored on appropriate electronic media. Information from potential clients may be filed in temporary files, but shall be subject to the same restrictions and limitations as other client files outlined below.
3. Firm personnel are prohibited from sharing or disclosing nonpublic information regarding any client or potential client of the Firm, except (i) as necessary to service client accounts including, without limitation, the settlement, billing, processing, clearing, or transferring of client transactions; or (ii) as otherwise directed by a client. Access to all client files and information, whether in paper or electronic format, is limited to Adviser personnel for the purposes of servicing client accounts.
4. Client information may not be stored on unapproved personal devices or removed from approved Firm systems except as necessary to service client accounts and in accordance with the Firm's information security policies.
5. All client files are secured at the end of each business day, and exterior doors always remain locked. Physical records containing client information shall be secured against unauthorized access whether maintained at the Firm's office or an approved remote work location.
6. All computers are set up so they 'lock' when not in use, requiring a password to gain access.
7. Traffic flow in the office is restricted, and no individuals, other than employees, are allowed free access to areas where client information is held.
8. Employees working remotely must utilize strong, unique passwords and multi-factor authentication (MFA), where available, to securely access the Firm's approved cloud-based systems and platforms. All remote access must be conducted through secure, password-protected networks and internet connections, and employees are expected to follow the firm's cybersecurity protocols to safeguard client and firm information. Public Wi-Fi should not be used to access Firm systems unless protected through Firm-approved security measures such as VPN or equivalent safeguards. The Firm does not maintain internal servers; therefore, all data access occurs through approved, secure cloud-hosted services.
9. The Firm will provide clients with a privacy policy notice (the "Privacy Notice") when the client engages the Firm for advisory or other services. The Privacy Notice details the types of nonpublic client information the Firm collects, the information the Firm shares with third parties or with affiliates, the kinds of third parties with which the Firm shares information, the policies and practices the Firm has in place to protect the confidentiality and security of nonpublic client information; the procedures the Firm has in place to permit clients or potential clients to opt out of information sharing arrangements with third parties (inapplicable to the Firm so long as the Firm only shares information with third parties for purposes of servicing client accounts), and the Firm's disposal policy.
10. The firm will provide its Privacy Notice to clients at the commencement of the advisory relationships and thereafter as required by applicable law. If the Firm's privacy practices change in a manner requiring revised disclosure, the firm will provide an updated Privacy Notice to affected clients in accordance with Regulation S-P and other applicable laws.
11. The Firm may provide nonpublic personal information to third-party service providers that perform services on the Firm's behalf, such as custodians, fund administrators, technology providers, auditors, legal counsel, and other vendors, provided such disclosures are consistent with applicable law and appropriate safeguards are maintained.
12. A copy of the Firm's current Privacy Notice is attached as **Appendix B**.
13. ALPHA WEALTH FUNDS has undertaken to protect client information in the course of its disposal as well. Employees either utilize personal desk-side shredders or place material to be shredded in a secure retention container.
14. The CCO is responsible for periodically reviewing the Firm's privacy practices, applicable regulatory requirements, and compliance with this policy, and for implementing updates as necessary..

11.2 Delivery of Privacy Policy

Initial delivery to each client of ALPHA WEALTH FUNDS Privacy Notice shall be made by the CCO upon the execution of an investment advisory agreement (“Client Agreement”) with the client. The Client Agreement shall contain a clause acknowledging receipt as evidence of delivery of the initial Privacy Policy.

In addition, each active client of ALPHA WEALTH FUNDS will be provided with a copy of the Privacy Notice upon commencement of the advisory relationship and thereafter as required by applicable law. The Firm shall maintain documentation evidencing delivery of required Privacy Notices.

If at any time ALPHA WEALTH FUNDS amends its Privacy Notice, the Firm shall provide each client a copy of the revised notice. If a client decides to close their account(s) or become an inactive client, the Firm will adhere to the privacy policies and practices as described above.

12. CYBERSECURITY

12.1 Purpose and Principles

ALPHA WEALTH FUNDS is committed to protecting client information, Firm data, and information systems from unauthorized access, misuse, disclosure, disruption, or loss. This Cybersecurity Policy establishes minimum security requirements for all supervised persons using Firm-approved systems, cloud-based platforms, and personally owned devices (“Bring Your Own Device” or “BYOD”).

We do not use an internal network (LAN), servers, or shared local drivers. All work is cloud-based. Employees use their own devices and are responsible for meeting the following standards. The CCO is responsible for cybersecurity oversight. This policy is reviewed and updated at least annually.

Employees are responsible for handling confidential client information, nonpublic personal information and Firm confidential information in accordance with the Firm’s Privacy Policy and applicable regulatory requirements.

12.2 Device Security

All employees must use care to:

- Use password-protected devices
- Install and maintain standard antivirus software
- Keep operating systems and apps up to date
- Enable auto-lock and timeout on devices
- Never share their device or login credentials with others
- Conduct work through secure and approved cloud platforms
- Download Sensitive files only to protected devices and promptly delete when completed with necessary uploads
- Use two-factor authentication on all work-related accounts
- Avoid Public Wi-Fi, or use only with a VPN
- Be cautious of suspicious emails, attachments or links
- Only install software from trusted sources and promptly remove unsupported or unauthorized software
- Encrypt devices where supported by the operating system
- Immediately report lost or stolen devices used for Firm business
- Report any suspected phishing attempts to the CCO immediately

Employees must not store or sync firm data to personal cloud services unless specifically approved by the CCO.

12.3 Artificial Intelligence (AI) Tools

ALPHA WEALTH FUNDS recognizes that artificial intelligence (“AI”) tools may improve productivity and support business operations. Employees may use only Firm-approved AI tools and services in connection with Firm business. Employees may utilize personally owned AI services for legitimate business purposes, provided such use complies with the Firm’s Privacy Policy, Code of Ethics, Books and Records requirements, and all applicable federal and state securities laws and regulations.

Approved AI tools that are integrated into the Firm’s authorized technology platforms, such as Google Workspace (including Gemini), may be used to assist with searching, summarizing, drafting, organizing, and analyzing Firm information, provided such use complies with the Firm’s Privacy Policy, Code of Ethics, and all applicable regulatory requirements.

Employees are responsible for exercising sound professional judgement when using AI. AI-generated content is intended to assist employees and may not replace independent analysis, supervisory review, or professional decision-making. All work product generated or assisted by AI remains the responsibility of the employee using the technology.

When using AI tools, employees shall:

- Review all AI-generated content for accuracy, completeness, and appropriateness before relying upon or distributing it.
- Verify factual, legal, regulatory, and investment-related information using appropriate sources before communicating such information internally or externally.
- Maintain all required records in accordance with the Firm's recordkeeping policies.
- Comply with all applicable marketing, advertising, confidentiality, and supervisory requirements.

Employees shall not:

- Input nonpublic personal information, confidential client information, or other sensitive Firm information into unapproved or personal AI platforms.
- Upload confidential client documents, proprietary Firm information, trading instructions, or other sensitive information into unapproved AI platforms.
- Use AI to generate investment recommendations, performance information, client communications, or marketing materials without appropriate human review and any required compliance review.
- Rely solely on AI-generated content for factual, legal, regulatory, or investment-related matters.
- Circumvent the Firm's recordkeeping, supervision, or approval requirements through the use of AI tools.

Employees must review AI-generated content for accuracy, completeness, confidentiality, and compliance before it is used, distributed, or relied upon in the course of Firm business.

The CCO shall maintain oversight of the Firm's use of AI technologies and may approve, restrict, or prohibit specific AI platforms or uses based upon regulatory requirements, cybersecurity considerations, confidentiality obligations, or other compliance risks. The Firm may maintain a separate list of approved AI technologies and permitted uses, which may be updated from time to time without amendment to this Compliance Manual.

12.4 Incident Reporting

If you think client data has been lost, stolen or accessed by someone unauthorized (e.g. lost laptop, hacked account, suspicious email clicked):

- Notify the CCO immediately
- Employees should not attempt to remediate a suspected cybersecurity incident beyond taking reasonable steps to secure their device or account unless directed by the CCO or another authorized individual
- The CCO will take steps to:
 1. Assess the scope of the breach
 2. Contain or disable compromised systems
 3. Determine whether regulators or affected clients must be notified
 4. Document the incident and response taken

Employees shall preserve any potential relevant evidence, including emails, screenshots, system messages, or other information related to the incident, and shall cooperate with the Firm's investigation. All incidents will be logged in an internal Cybersecurity Incident Log and reviewed as part of the Firm's annual compliance review.

The Firm's incident response procedures are designed to detect, respond to, and recover from unauthorized access to or use of customer information. The CCO will assess the nature and scope of any incident, identify affected systems and customer information, take appropriate steps to contain and control the incident, and determine whether sensitive customer information was or is reasonably likely to have been accessed or used without authorization. Where notification is required under Regulation S-P, the Firm will provide notice to affected individuals as soon as practicable, but no later than 30 days after becoming aware that an incident requiring notification has occurred or is reasonably likely to have occurred, unless an applicable exception applies.

The CCO will determine whether the incident constitutes a reportable security incident under applicable law or regulation, including Regulation S-P, and coordinate any required notifications to clients, regulators, vendors, insurers, or law enforcement, as appropriate. Cybersecurity incidents, testing results, and lessons learned will be reviewed during the Firm's annual compliance review, and this policy will be updated as appropriate to address evolving risks and regulatory requirements.

12.5 Third-Party Vendor Risk Management

The Firm performs risk-based due diligence of vendors that have access to client information or Firm systems, considering factors such as information security, regulatory compliance, business continuity, and the nature of the services provided. Vendor relationships are periodically reviewed based on the level of risk presented. Agreements with such vendors must include confidentiality provisions and other terms designed to protect client information and business continuity.

For providers that maintain customer information systems, the Firm will maintain written policies and procedures reasonably designed to require appropriate oversight through due diligence and monitoring and to ensure that the Firm receives timely notice of security incidents affecting customer information. Applicable service-provider arrangements should require notification to the Firm as soon as possible, but no later than 72 hours after the service provider becomes aware of a qualifying breach involving unauthorized access to a customer information system.

12.6 Business Continuity and Data Recovery

The Firm relies on cloud-based systems and third-party service providers that maintain data backup and disaster recovery capabilities. In the event of a disruption affecting Firm operations or technology systems, the Firm will work with its service providers to restore access to systems and client information as promptly as reasonably practicable. Employees shall promptly report any operational disruption affecting Firm systems to the CCO.

13. PROMOTIONAL ACTIVITIES

13.1 Requirements

An investment adviser is prohibited from using any advertisement that contains any untrue statement of material fact or that is otherwise misleading. The prohibition includes publishing, circulating, or distributing any advertisement that does not comply with SEC rule 206(4)-1 (the "Marketing Rule"). [SEC.gov | Investment Adviser Marketing](https://www.sec.gov/investor/Pages/InvestmentAdviserMarketing.aspx)

Under the Marketing Rule, "advertisement" includes:

- Any direct or indirect communication made by an investment adviser that offers or promotes the adviser's services to prospective clients or investors in a private fund advised by the adviser, or
- Any communication to existing clients or investors that offers new advisory services or promotes the adviser.

The term also includes compensated testimonials and endorsements and any communications that include performance results, subject to specific requirements.

The SEC regulates closely the manner in which investment advisers portray themselves and their investment returns to existing and prospective investors, including how performance information, charts and graphs are presented. The following guidelines should be used to ensure the Firm's compliance with these rules.

13.2 Advertising Guidelines

The following devices or sales presentations, and the use thereof in any advertising shall be deceptive or misleading and are prohibited practices:

1. Performance comparison charts or graphs that show a distorted, unfair or unrealistic relationship between the Firm's past performance, progress or success and that of another company, business, industry index or investment media, especially when material differences are not disclosed;
2. The use of a layout, format, size, kind and color of type so as to attract attention to favorable or incomplete portions of the advertising matter, or to minimize less favorable, modified or modifying portions necessary to make the entire advertisement a fair and truthful representation;

3. Statements or representations regarding future investment performance, profit, appreciation, or success that are false, misleading, unsubstantiated, or otherwise inconsistent with the Marketing Rule are prohibited.
4. Testimonials or endorsements, whether of individual clients or groups of them, except as stipulated by the SEC Marketing Rule 206(4)-1. Testimonials or endorsements may only be used if they meet the conditions under the Marketing Rule, including proper disclosure of compensation, conflicts of interest, and client status.
 - a) Please see SEC guidelines for how testimonials and endorsements may be employed for advertising purposes: [SEC.gov | Investment Adviser Marketing](https://www.sec.gov/investor/pubs/investment_adviser_marketing.htm)
5. Making generalizations, generalized conclusions, opinions, representations and general statements based upon a particular set of facts and circumstances unless those facts and circumstances are stated and modified or explained by such additional facts or circumstances as are necessary to make the entire advertisement a full, fair, and truthful representation;
6. The use of sales kits or film clips, displays or exposures, which, alone or by sequence and progressive compilation, tend to present an accumulative or composite picture or impression of certain, or exaggerated potential, profit, safety, return or assured or extraordinary investment opportunity or similar benefit to the prospective purchaser;
7. Distributing any non-factual or inaccurate data or material by words, pictures, charts, graphs, or otherwise, based on conjectural, unfounded, extravagant, or flamboyant claims, assertions, predictions or excessive optimism;
8. A representation that any graph, chart or formula can in and of itself be used to determine which securities to buy or sell;
9. Any package or bonus deal, prize, gift, gimmick or similar inducement, combined with or dependent upon the sale of some other product, contract or service, unless such unit or combination has been fully disclosed and specifically described and identified in the application as the security being offered;
10. Advertisements stating or implying that any report, analysis, or service is free, unless it really is free;
11. Performance data that does not reflect the deduction of advisory fees, brokerage or other commissions, and any other expenses that accounts would have or actually paid;
12. Compares model or actual results to an index without disclosing all material facts relevant to the comparison;
13. Any suggestion or implication that the SEC or another agency has sponsored, recommended, or approved the Firm or any of its advisers based upon registration or any other qualification or claim. The SEC has not approved or endorsed this firm or any of its advisers. Registration does not imply a certain level of skill or training.
14. The use of titles that imply a level of professional competence, education and/or special training, unless you actually have that training; this includes the use of “registered investment adviser,” unless 1) the adviser actually is registered, and 2) the use of the term does not imply a degree or other licensed professional position. For example, advisers should not use the term “RIA” after their names;
15. Other promotional devices or sales presentations that would be considered fraudulent, misleading or in violation of SEC rules or applicable state securities laws.

13.3 Performance Advertising

The Marketing Rule permits the use of performance advertising (including hypothetical, model, and related performance) if the following requirements are met:

1. Net performance is presented alongside gross performance with equal prominence for the same time periods;
2. Time periods shown include 1-, 5-, and 10-year periods (or since inception if shorter);
3. Hypothetical performance (e.g., model, back-tested, projected) is only shown if appropriate policies are in place to ensure it is relevant, based on reasonable assumptions, and accompanied by disclosures;
4. Related and extracted performance is not misleading and includes disclosures about selection criteria and limitations;
5. All performance claims must be fair and balanced and must include the material risks and limitations that may affect the audience’s understanding;
6. The adviser must retain books and records sufficient to support all performance data presented.

13.4 Firm Advertising Policies

The Chief Compliance Officer (CCO) is responsible for implementing and monitoring the Firm's advertising and marketing policies and for reviewing materials to ensure consistency with regulatory requirements, including the SEC Marketing Rule (Rule 206(4)-1).

The CCO will maintain a central file containing a copy of each advertisement, along with the date and means of distribution. Advertising and promotional materials include, but are not limited to: websites, pitch decks, client newsletters, performance presentations, email campaigns, social media posts, public commentary, and communications that qualify as "advertisements" under SEC rules.

1. Advertising Review Procedures

- a. All advertising and promotional materials must be reviewed and approved by the CCO or a designated reviewer authorized by the CCO prior to first use, unless exempted under the firm's Advisor Outreach Policy (see Section 13.4.2)
- b. The Firm maintains a digital advertising review log or other centralized method to document compliance review and approval. Each approved item is recorded with the name of the reviewer, approval date, and a reference to the communication or campaign. The review log should also document any material revisions requested during the compliance review process and the date final approval was granted.
- c. Employees may not alter or reuse approved advertising materials without obtaining additional approval from the CCO or designated reviewer.
- d. Written communications intended for distribution to multiple clients or prospects (e.g., newsletters, market commentaries, quarterly letters) will be reviewed for compliance by the Firm's Marketing Manager or another designated reviewer trained in SEC advertising standards. The CCO will maintain supervisory oversight of the process and may conduct periodic reviews to ensure consistency with regulatory requirements.
- e. All advertising and marketing materials are retained for at least five years from the date of last use, along with supporting documentation, including:
 - Performance calculations
 - Source data and assumptions
 - Disclosures and footnotes
 - Third-party citations and documentation
 - Administrator reports or other source records supporting published performance
- f. Marketing materials that are drafted or materially assisted by artificial intelligence ("AI") remain subject to the same review, approval, supervision, recordkeeping, and regulatory requirements as all other advertising materials. Employees are responsible for verifying the accuracy of AI-generated content, ensuring required disclosures are included, and confirming that all statements are fair and balanced prior to distribution.
- g. Promotional giveaways, contests, sweepstakes, referral campaigns, consultation incentives, sponsorship promotions, or similar marketing programs must be reviewed and approved by the CCO prior to implementation to ensure compliance with the SEC Marketing Rule and other applicable legal and regulatory requirements.

This policy applies to all marketing content distributed in print, facsimile, electronic, or any other form. Public presentations, podcasts, webinars, speaking engagements, workshops, interviews, media appearances, and similar promotional activities that promote the Firm or its advisory services are considered advertising under this policy and are subject to the Firm's advertising review and approval procedures, as applicable.

2. Adviser Outreach Policy (Personalized Communication)

To support client acquisition while maintaining regulatory compliance, the Firm allows advisers to use personalized messaging for outreach without requiring prior approval for each individual message. Personalized outreach is allowed without prior CCO approval, as long as it follows this policy. Advisers must complete annual outreach training and attestation. All written communications must be archived through Firm systems and the Firm will conduct random audits of outreach. This policy applies to all one-on-one outreach used to market services, including:

- Email
- Phone Calls

- Text Messages
- Social Media Direct Messaging (e.g. LinkedIn, Facebook)
- In-Person Prospecting

a. Prohibited Practices: Advisors may not:

- Mention actual, projected, or hypothetical performance (e.g., “we returned 20% last year”)
- Reference client testimonials or third-party endorsements (e.g., “my clients say I helped them retire early”)
- Use misleading or exaggerated language (e.g., “guaranteed,” “no risk,” “the best in the industry”)
- Promise outcomes (e.g., “I can double your money”)
- Imply that SEC registration reflects any specific skill or approval by regulators

Employees are responsible for accurately identifying their affiliation with the Firm when conducting business communications and may not create anonymous, misleading, or deceptive online content relating to the Firm or its advisory services.

b. Permitted with Caution: Advisors may:

- Refer to their fiduciary obligation, if described accurately (e.g., “As a fiduciary, I’m required to act in your best interest.”)
- Personalize messages based on a shared background, career, or interest
- Offer general education (e.g., tax strategies, retirement concepts) without making specific recommendations
- Invite prospects to schedule a call or meeting
- Discuss the Firm’s advisory services, investment philosophy, scheduling availability, and general educational information, provided no individualized investment recommendations, performance claims, or misleading statements are made
- Testimonials, endorsements, third-party ratings, and performance claims may only be used if pre-approved by compliance and accompanied by all required disclosures under the SEC Marketing Rule
- Hypothetical, model, or extracted performance presentations must include appropriate disclosures, be offered only to intended recipients (e.g., sophisticated clients), and be supported by clear records of assumptions, criteria, and risk limitations
- Employees may share or repost third-party content only when they have a reasonable basis to believe the information is accurate and not misleading. Sharing third-party content does not relieve the Firm or the employee of responsibility for complying with applicable securities laws and the Firm’s advertising policies.

Advisors may engage in both direct messaging and public posting on social media platforms for business purposes. Direct messages are subject to the firm’s outreach policy. Public posts must either (1) be pre-approved by compliance, or (2) follow firm-approved posting guidelines and be subject to random compliance review. All social media communications must be archived or reported for retention.

Advisors must use Firm-approved systems for email, text, and social media communications. If external platforms are used (e.g., personal phones or LinkedIn), messages must be downloaded or submitted to compliance weekly for archiving.

14. SOLICITATION ARRANGEMENTS & REFERRAL FEES

14.1 General

No employee or third party may receive compensation, directly or indirectly, for referring prospective clients or investors to ALPHA WEALTH FUNDS without prior approval from the CCO or Firm Management. All referral, testimonial, endorsement, and promoter arrangements must comply with Rule 206(4)-1 under the Investment Advisers Act of 1940 (the “Marketing Rule”) and any applicable state laws. The CCO shall conduct appropriate due diligence prior to approving any compensated referral arrangement.

14.2 Referral, Testimonial and Endorsement Arrangements

ALPHA WEALTH FUNDS may enter into compensated referral, testimonial, or endorsement arrangements only when such arrangements comply with Rule 206(4)-1 under the Investment Advisers Act of 1940 (“the Marketing Rule”) and any applicable federal or state laws.

Prior to entering into any compensated referral or endorsement arrangement, the Firm shall:

1. Conduct appropriate due diligence to determine that the individual or entity is eligible to participate in the arrangement under the Marketing Rule.
2. Enter into a written agreement, when required, describing the services to be provided, the compensation to be paid, and the responsibilities of each party.
3. Ensure that all required disclosure regarding compensation, material conflicts of interest, and the nature of the relationship between the Firm and the promoter are provided to prospective clients or investors as required by the Marketing Rule.
4. Establish reasonable oversight procedures to confirm that promoters comply with the terms of their agreement and applicable regulatory requirements.
5. Maintain books and records relating to the referral arrangement, including agreements, compensation records, required disclosures, due diligence documentation, and any other records required under the Advisers Act and Rule 204-2.

The Firm shall not compensate any individual or entity that is an “ineligible person” as defined under Rule 206(4)-1, unless an exception permitted by the rule applies. As part of its due diligence process, the CCO shall review the promoter’s regulatory and disciplinary history and determine whether the individual or entity is eligible to participate in a compensated referral arrangement.

Employees who receive compensation for referring prospective clients or investors are subject to this policy and must comply with all applicable disclosure requirements.

The CCO shall oversee the implementation of all compensated referral, testimonial, and endorsement arrangements and shall ensure that any agreements, disclosures, due diligence documentation, and other records required under the SEC Marketing Rule and the Firm’s recordkeeping policies are prepared, maintained, and retained in accordance with applicable regulatory requirements. Referral arrangements with strategic partners, professional firms, consultants, and other third parties shall be documented by written agreement when required and reviewed periodically by the CCO for ongoing compliance.

15. VIOLATIONS – REPORTING & PENALTIES

It is the policy of ALPHA WEALTH FUNDS that all supervised persons of the Firm must strictly comply with the provisions of the Firm’s Compliance Manual, Code of Ethics, and all applicable federal and state securities laws and regulations. The Firm acknowledges that inadvertent violations may occasionally occur. If a violation is identified, the violation should be promptly reported to the Chief Compliance Officer to allow for timely investigation, correction, and where appropriate, remediation.

Alpha Wealth Funds encourages all employees to report any known or suspected violations of securities laws, ethical breaches, cybersecurity incidents, privacy concerns, or Firm policies. Reports may be made confidentially to the CCO. The firm prohibits retaliation against any individual who, in good faith, reports a concern, participates in an investigation, or assists in resolving a compliance matter. The Firm supports whistleblower protections in accordance with SEC and federal guidelines.

The CCO shall promptly investigate reported violations, document the facts and findings, determine appropriate corrective or remedial actions, and maintain records of material violations and their resolution in accordance with the Firm’s recordkeeping policies. Where appropriate, the CCO will evaluate whether changes to Firm policies, procedures, training, or supervisory practices are warranted to reduce the likelihood of future violations.

Willful, repeated, or material violations of the Compliance Manual, Code of Ethics, or applicable securities laws, or failure to promptly report known violations, may result in disciplinary action up to and including additional training, written warnings, suspension of responsibilities, financial penalties where permitted, termination of employment or association with the Firm, or other corrective action deemed appropriate under the circumstances. Material violations and corrective actions shall be considered as part of the Firm’s annual compliance review to evaluate the effectiveness of the Firm’s compliance program.

16. VOTING, TENDER OFFERS & CLASS ACTIONS

It is the policy of ALPHA WEALTH FUNDS to comply with Rule 206(4)-6 under the Investment Advisers Act of 1940 and applicable Form ADV disclosure requirements regarding proxy voting. The Firm will exercise proxy voting authority only where it has expressly accepted such authority and disclose its proxy voting practices in Form ADV Part 2A or other applicable client disclosures.

16.1 The Funds

An investment adviser has a fiduciary duty to vote proxies in the best interests of the client and to treat clients fairly.

As investment manager to the Funds, ALPHA WEALTH FUNDS will exercise all rights, powers, and privileges of ownership in all Fund's property. ALPHA WEALTH FUNDS will retain the right to vote, give assent, and execute all proxies with relation to Funds investments. ALPHA WEALTH FUNDS will also retain the right to take any action with respect to securities owned by the Funds that are named in or subject to any class action lawsuits.

In the event of a material conflict of interest between the Firm and the Funds, ALPHA WEALTH FUNDS will vote proxies in accordance with its fiduciary duty to the Funds. A written record of the conflict, the basis for the voting decision, and any actions taken to mitigate the conflict shall be maintained in accordance with the Firm's recordkeeping policies. The Firm may refrain from voting proxy if the cost of voting exceeds the expected benefit to the client.

Proxy voting decisions will be made in good faith and in a manner reasonably believed to be in the best interests of the applicable Fund and its investors. As investment manager to the Funds, the Firm may evaluate and respond to tender offers affecting Fund investments when consistent with the governing Fund documents and its fiduciary duties.

16.2 Separately Managed Accounts

As a matter of policy and practice, ALPHA WEALTH FUNDS has no authority to vote proxies on behalf of advisory clients in separately managed accounts. ALPHA WEALTH FUNDS may offer assistance as to proxy matters upon a client's request, but the clients always retain the proxy voting responsibility. Accordingly, ALPHA WEALTH FUNDS does not adopt or maintain proxy voting policies for such accounts as described under SEC Rule 206(4)-6.

Likewise, ALPHA WEALTH FUNDS will take no action and will not render any advice with respect to any securities held in any client's account that are named in or subject to class action lawsuits. The Firm will make reasonable efforts to promptly forward class action notices or other relevant information received by the Firm to the affected client. The clients are responsible for pursuing or responding to such matters directly.

The Firm does not have discretionary authority to respond to tender offers on behalf of separately managed account clients unless such authority has been specifically granted in writing. Any tender offer materials received by the Firm for separately managed account clients will be forwarded to the client of the client's custodian, as appropriate, and the client will remain responsible for making all election decisions.

16.3 Compliance Oversight

The CCO is responsible for implementing and monitoring ALPHA WEALTH FUNDS policies regarding both proxy voting and class action lawsuits. This includes ensuring that:

- No proxy voting authority is accepted without appropriate policy changes and regulatory disclosures;
- All information received about class action lawsuits involving securities held in client accounts is promptly forwarded to the relevant clients; and
- Appropriate records related to proxy voting and class action lawsuits are maintained.

Any material conflicts of interest identified in connection with proxy voting or tender offer decisions are documented and resolved in accordance with the Firm's fiduciary obligations.

Records relating to proxy voting authority, proxy voting decisions, tender offers, and class action communications shall be maintained in accordance with Rule 204-2 and the Firm's record retention policies.

17. BUSINESS CONTINUITY PLAN

The purpose of this Business Continuity Plan (BCP) is to ensure that ALPHA WEALTH FUNDS can continue to operate and serve clients with minimal disruption in the event of a business interruption, including natural disasters, technology failures, cybersecurity incidents, or unavailability of key personnel.

This plan is designed to meet regulatory expectations under the Investment Advisers Act of 1940 and demonstrate reasonable planning for business disruption scenarios

17.1 Scope and Key Assumptions

Physical Office Presence: ALPHA WEALTH FUNDS maintains a primary office location that is used for secure mail delivery, records storage, occasional in-person client meetings, and as a temporary alternate work location during disruptions to employees' home-office environments.

Remote Workforce (BYOD): All employees primarily work remotely and use their own devices (BYOD) to access firm resources over the internet.

No On-Site Servers: The firm does not host any internal file servers or LAN resources at the office; all critical systems are cloud-based.

Key Cloud Platforms:

- Google Workspace (email, documents, storage)
- PandaDoc (client agreements)
- SmartAsset and other lead-generation platforms
- Qualified custodians (Interactive Brokers, TradeStation, etc.)

Office as Backup Site: If a widespread home-internet outage or other event prevents employees from working remotely, the office can serve as a temporary work location with secure Wi-Fi.

Critical-System Access: Because all core applications are cloud-hosted, employees can transition between home and office (or any secure internet connection) with minimal downtime.

17.2 Communication and Continuity Components

1. Cloud-Based Systems
 - a. Firm data and documentation are stored in Google Drive, accessible from any secure, internet-connected device
 - b. Employees can continue business operations remotely using their personal devices
 - c. No physical servers or LAN connections are used, reducing dependency on any single physical location
2. Employees and clients can reach the Firm via:
 - a. Company email
 - b. Mobile devices and backup phones if necessary
3. In the event of system downtime:
 - a. Management will determine the appropriate communication method based on the nature of the disruption, including email, telephone, text messaging, or other available communication platforms.
 - b. Clients will be notified of limited availability and alternate contact methods if needed
4. Coordination with Critical Service Providers

During a business disruption, the firm will coordinate, as appropriate, with qualified custodians, fund administrators, counterparties, technology providers, and other critical service providers to facilitate the continuation of trading, client servicing, cash movements, and other operational activities. The CCO or designated management personnel will maintain current contact information for key service providers and coordinate communications as necessary to support business continuity.

The Firm relies upon third-party technology providers and qualified custodians for many critical business functions. The CCO will periodically review key vendor contacts and service continuity information and maintain current contact information for critical vendors.

17.3 Loss of Key Personnel

- The Firm maintains documentation of critical business functions, key contacts, system access procedures, and operational responsibilities to facilitate continuity in the event a key employee becomes unavailable. Management may designate qualified personnel or outside service providers to temporarily perform essential business functions when appropriate.
- A designated backup contact or authorized individual may be appointed in writing to handle urgent matters if the CCO is incapacitated or unavailable.
- Existing client authorizations and discretionary authority, where applicable, remain in effect during a business disruption, subject to the governing client agreements and the procedures of the applicable custodian.

17.4 Cybersecurity Incident or Data Loss

- Refer to Section 12: Cybersecurity Protocol for the Firm's cybersecurity incident response procedures.
- In the event of a data breach or loss of access to cloud systems:
 - The CCO will initiate incident response and coordinate with vendors (e.g., Google support, custodians)
 - All client data is stored with at least one layer of redundant cloud-based backup
 - Trade and account activity can be resumed once systems are restored or accessed via alternate device

The CCO will determine whether any regulatory, contractual, or client notifications are required as a result of the disruption and will coordinate such notifications when appropriate.

17.5 Disaster Recovery Triggers

This BCP may be activated in response to natural disasters, major power outages, cybersecurity incidents, technology platform failures, unavailability of key personnel, regulatory or civil emergencies affecting Firm operations.

During a business disruption, the Firm's priorities are to:

1. Protect client information
2. Restore communications
3. Maintain access to client accounts
4. Resume advisory services
5. Meet regulatory obligations

17.6 Testing and Review

The BCP will be reviewed at least annually and updated as needed. The CCO will confirm that all employees can access firm systems remotely, contact clients without disruption and locate key files and client contact information. The Firm may conduct informal exercises or review what-if scenarios periodically. The CCO will document the completion of the annual review and any testing performed, identify any deficiencies noted, and document corrective actions, if applicable.

17.7 Recordkeeping

The Firm will retain a copy of the current BCP, any updates or testing documentation, significant incident reports, corrective actions, emergency contact lists for employees, custodians, vendors and legal counsel.

18. CONCLUSION

This Compliance Manual is intended to provide guidance to all supervised persons of ALPHA WEALTH FUNDS in complying with applicable federal and state securities laws and regulations, fulfilling the Firm's fiduciary obligations, and maintaining the highest standards of professional and ethical conduct.

All supervised persons are expected to become familiar with the contents of this Manual, comply with the policies and procedures contained herein, and promptly consult the CCO with any questions regarding their responsibilities or application of these policies.

Compliance is a shared responsibility. All supervised persons are expected to promptly notify the CCO or any actual or suspected violations of this Manual, changes in business activities or personal circumstances that may require regulatory updates, or any other matter that could affect the Firm's compliance obligations.

This Compliance Manual is reviewed at least annually and may be amended at any time to reflect changes in applicable laws, regulations, Firm operations, technology, or identified compliance risks. Employees will be notified of material changes and may be required to acknowledge receipt, understanding, and continued compliance with the updated Manual.

Alpha Wealth Funds, LLC
Compliance Manual Receipt Acknowledgement

I, the undersigned supervised person of Alpha Wealth Funds, LLC, hereby acknowledge that I have received the Compliance Manual including, but not limited to, the Code of Ethics, Insider Trading Policy and Privacy Policy and related supervisory procedures for Alpha Wealth Funds, LLC.

I certify that I have read, understood, and agree to comply with the Compliance Manual and its supporting exhibits. I understand that I am responsible for complying with the policies and procedures contained in the Manual, all applicable federal and state securities laws and regulations, and the Firm's fiduciary obligations. I acknowledge that I have asked the Chief Compliance Officer any questions necessary to clarify its contents.

I understand that the use of Firm-approved technology, including artificial intelligence tools, remains subject to the Firm's compliance Manual, Privacy Policy, Cybersecurity Policy, and supervisory procedures.

I further acknowledge that I am responsible for promptly reporting any actual or suspected violations of the Compliance Manual, Code of Ethics, applicable securities laws, cybersecurity incidents, privacy concerns, or other firm policies to the CCO.

I understand that the Compliance Manual may be amended from time to time and that I may be required to review and acknowledge material revisions. I agree to comply with all future updates to the Manual upon notification by the Firm.

By signing below, I acknowledge my responsibility to comply with the policies and procedures set forth in the Compliance Manual and its supporting Exhibits. I confirm that I will act in accordance with all applicable federal securities laws and the Firm policies therein. I understand that failure to comply may result in disciplinary action.

Date: _____

Signature: _____

Print Name: _____

Title: _____



Privacy Policy

OF

Alpha Wealth Funds, LLC.

1887 Gold Dust Lane

Suite 203A

Park City, Utah 84060

Privacy Policy

Introduction

Alpha Wealth Funds, LLC (“ALPHA WEALTH FUNDS” or the “Firm”) takes measures to ensure that the use and disclosure of your private personal information is consistent with applicable law. ALPHA WEALTH FUNDS is committed to maintaining the confidentiality and privacy of your personal information, consistent with Regulations S-P and other applicable privacy laws.

Our Consumer Information Privacy Policy (“Privacy Policy”) explains what nonpublic personal information we collect, why the Firm collects it, how the Firm protects your nonpublic personal information, and how and why, in certain cases, the Firm shares such information amongst ALPHA WEALTH FUNDS or with other parties. Our Privacy Policy may be amended from time to time. Our Privacy Policy applies to nonpublic personal information collected or used when the Firm offers investment products or services to individuals for personal, family, or household purposes. This disclosure is made on behalf of the Firm listed in the “Application of Privacy Policy for Alpha Wealth Funds, LLC” section below.

Our Privacy Policy applies only to individual Firm investors (both current and former investors) who have a direct relationship with ALPHA WEALTH FUNDS. If you own ALPHA WEALTH FUNDS investment products or receive ALPHA WEALTH FUNDS services in the name of a third-party broker dealer, investment adviser, or other financial service provider, that third party’s privacy policies may apply to you.

Information That We Collect and May Disclose

ALPHA WEALTH FUNDS collects information from and about you in order to provide the superior level of service that you expect. Nonpublic personal information about you may include: your name, mailing address, e-mail address, tax identification number, age, account information, investment amounts in our companies, marital status, number of dependents, assets, debts, income, net worth, employment history, financial statements, beneficiary information, personal bank account information, credit history information, broker dealer, financial adviser, IRA custodian, account joint owners and other similar parties, the Firm’s investment products and services you purchase, your account balance or transactional history with the Firm, the fact that you are or have been an investor in a Firm sponsored investment and particulars related to any such investment.

Specific examples of personal information that the Firm may collect and may disclose to affiliates and certain third parties include:

- Information the Firm receives from you on applications, subscription agreements, or other forms.
- Information the Firm has such as account balances, payment history, account activity and financial statements.
- Information obtained from others, such as credit reports from consumer credit reporting agencies.

How We Use and Disclose Information

ALPHA WEALTH FUNDS and third-party service providers work together to provide a variety of investment products and services, and they may need to share some or all nonpublic personal information collected on you to maintain an efficient and effective network of products and services. ALPHA WEALTH FUNDS believes that by sharing information about you and your accounts among our companies and partners, the Firm is better able to serve your investment needs and to suggest services or educational materials that may be of interest to you. The responsible use and disclosure of the nonpublic personal information the Firm collects is crucial to our ability to provide our clients with the type of goods and services they expect, and may occur under a variety of different circumstances. For example, the Firm may:

- Use your nonpublic personal information internally for the purposes of furthering our business, which may include analyzing your information, matching your information with the information of others, processing services, maintaining accounts, resolving disputes, preventing fraud and verifying your identity.
- Disclose your nonpublic personal information when required by law, such as requests for personal information in connection with a judicial, administrative or investigative matter.
- Use and disclose your nonpublic personal information on an aggregate basis. This means that the Firm combines parts of your information with parts of the information from our other users without including your name, complete telephone number, complete e-mail address or your street address, in the combination. Examples of how the Firm uses aggregate information include determining and disclosing demographic information such as the average income of investors in our funds.

Sharing With ALPHA WEALTH FUNDS Affiliates and Nonaffiliated Service Providers

Sharing with Affiliates

ALPHA WEALTH FUNDS may share your nonpublic personal information among Firm affiliates engaged in investment or other related financial service activities. Examples might include customer-initiated service requests, establishing and managing your investor accounts, completing your investor transactions, and sharing information with parties acting at your request and on your behalf, such as your broker-dealer, financial adviser, joint owners and IRA custodian.

Sharing With Nonaffiliated Service Providers

ALPHA WEALTH FUNDS may disclose your nonpublic personal information to nonaffiliated service providers who perform business functions on our behalf including marketing of our own investment products and services, check printing, and data processing. Nonaffiliated

third party service providers often aid us in the efficient and effective delivery of services and there may be circumstances where it is necessary to disclose nonpublic personal information the Firm collects to such parties. However, before the Firm discloses nonpublic personal information to a nonaffiliated party, we require them to agree to keep our investor information confidential and secure and to use it only as authorized by us. Also, ALPHA WEALTH FUNDS will only share your nonpublic personal information with nonaffiliated third parties under circumstances not covered by state or federal law “opt-out” notice exceptions, such as servicing a financial product or service authorized by the customer, resolving consumer disputes, and protecting against potential fraud or unauthorized transactions. Currently, ALPHA WEALTH FUNDS does not share nonpublic personal information in a manner that would require providing an opt-out under Regulation S-P. If this policy changes, affected investors will be provided with appropriate notice and an opportunity to opt out.

ALPHA WEALTH FUNDS may also disclose the following information to companies that perform marketing services on our behalf or to other financial institutions with which the Firm has joint marketing agreements:

- Information the Firm receives from you on applications or other forms, such as your name, address, social security number, assets and income.
- Information about your transactions with us, our affiliates, or others, such as your payment history, and parties to the transactions.
- Information the Firm receives from a consumer reporting agency, such as your creditworthiness and credit history.

The Firm may share information with qualified custodians, fund administrators, auditors, legal counsel, technology providers, document management providers, and other service providers as necessary to provide services, subject to appropriate confidentiality obligations.

ALPHA WEALTH FUNDS requires all joint marketers to have written contracts with us that specify appropriate use of your personal information, require them to take steps to safeguard your personal information, and prohibit them from making unauthorized or unlawful use of your personal information. ALPHA WEALTH FUNDS does *not* share, sell, or rent your personal private information with outside marketers who may want to offer you their own products and services to you.

How the Firm Protects Your Information

ALPHA WEALTH FUNDS maintains a comprehensive information security program designed to ensure the security and confidentiality of customer information, protects against threats or hazards to the security of such information, and prevents unauthorized access. This program includes:

- Procedures and specifications for administrative, technical and physical safeguards.
- Security procedures related to the processing, storage, retention and disposal of confidential information.
- Programs to detect, prevent and when necessary respond to attacks, intrusions or unauthorized access to confidential information.
- Restricting access to customer information to employees who need to know that information to provide products and services to you, and appointing specific employees to oversee our information security program.

The firm may utilize Firm-approved artificial intelligence (“AI”) technologies to assist with internal business operations. Employees may not input nonpublic personal information, confidential client information, or other sensitive information into unapproved AI platforms. Any approved use of AI is subject to the Firm’s Privacy Policy, Cybersecurity Policy, and applicable regulatory requirements.

The Firm utilizes cloud-based technology platforms, multi-factor authentication where available, role-based access controls, and administrative technical, and physical safeguards designed to protect client information from unauthorized access, use, or disclosure.

If the firm becomes aware of unauthorized access to or use of sensitive customer information, the Firm will investigate the incident and determine whether notification to affected individuals, regulators, or other parties is required under applicable law.

Availability of Our Privacy Policy

ALPHA WEALTH FUNDS will provide its Privacy Notice at the commencement of the client relationships and thereafter as required by applicable law. If the Firm’s privacy practices change in a manner requiring revised disclosure, affected clients will receive an updated Privacy Notice.

Notification of Changes to Our Privacy Policy

If ALPHA WEALTH FUNDS decides to change our Privacy Policy, the Firm will notify its investors. If at any point we decide to use or disclose your nonpublic personal information in a manner different from that stated at the time it was collected, ALPHA WEALTH FUNDS will notify you in writing. The Firm will otherwise use and disclose a user’s or an investor’s nonpublic personal information in accordance with the Privacy Policy that was in effect when such information was collected.

Change in Control

If ALPHA WEALTH FUNDS experiences a “change in control” (defined below), then the Firm may amend our information practices as described in this Privacy Policy. The Firm will disclose your nonpublic personal information to the company or other legal entity that

succeeds the company subject to the change in control. The privacy policy of the succeeding legal entity will then govern the nonpublic personal information that the applicable firm has collected from you under this Privacy Policy. However, if applicable law prohibits the succeeding legal entity's privacy policy from governing your nonpublic personal information, then this Privacy Policy shall continue to govern. "Change in control" means any of the following events:

- A reorganization, merger, consolidation, acquisition or other restructuring involving all or substantially all of ALPHA WEALTH FUNDS's voting securities and/or assets, by operation of law or otherwise;
- The Firm's insolvency;
- A general assignment for the benefit of creditors;
- The appointment of a receiver;
- The filing of a bankruptcy or insolvency proceeding; or
- The liquidation of assets.

Scope of Privacy Policy for Alpha Wealth Funds, LLC

This Privacy Policy applies to the following companies: Alpha Wealth Funds, LLC and their respective subsidiaries and all other funds or entities created in the future that offer investment products or services to individuals for personal, family, or household purposes.

Mobile Messaging (SMS) Policy

Overview

This Privacy Policy states what Alpha Wealth Funds ("AWF", "we", "us", "our") will and will not do with personal data collected independently by AWF or voluntarily provided to us by individuals interacting with our website (Users). Our website includes <https://www.alphawealthfunds.com/> and all subdomains thereof (Site). Personal data (Data) includes any information that can be directly or indirectly used to identify an individual. Please read this Privacy Policy carefully to understand our policies and practices. By using or accessing the Site you acknowledge that you have read, understood, and agree to be bound by the terms and conditions of this Privacy Policy. By submitting any Data to us, you will be deemed as having given your consent, where necessary and appropriate, for the disclosures and uses referred to in this Privacy Policy.

SMS Terms & Conditions

SMS Consent Communication:

The information (Phone Numbers) obtained as part of the SMS consent process will not be shared with third parties for marketing purposes. SMS opt in and Phone numbers collected for Communications purposes will not be shared with Third parties and affiliates for Marketing.

Types of SMS Communications:

If you have consented to receive text messages from Alpha Wealth Funds, you may receive messages related to the following:

- Appointment reminders
- Follow-up messages
- Billing inquiries
- Promotions or offers (if applicable)
- Reminders about program application or course preparation processes
- Account notifications
- Information about Alpha Wealth Funds programs or links to new materials
- Information about current or upcoming promotions

Example: *AWF Gap Year Early Bird ends on January 1st. Claim your space and save \$500 by enrolling now: <https://www.alphawealthfunds.com>. Reply STOP to opt-out of SMS messaging at any time.*

Message Frequency:

Message frequency may vary depending on the type of communication. For example, you may receive up to 10 SMS messages per week related to your account and investment allocation. You may receive up to 1 message per week related to marketing and promotions.

Potential Fees for SMS Messaging:

Please note that standard message and data rates may apply, depending on your carrier's pricing plan. These fees may vary if the message is sent domestically or internationally.

Opt-In Method:

You may opt-in to receive SMS messages from Alpha Wealth Funds in the following ways:

- Verbally, during a conversation
- By submitting an online form
- By filling out a paper form
- By contacting us first

Opt-Out Method:

You can opt-out of receiving SMS messages at any time. To do so, simply reply "STOP" to any SMS message you receive. Alternatively, you can contact us directly to request removal from our messaging list.

Additional Options:

If you do not wish to receive SMS messages, you can choose not to check the SMS consent box on our forms.

Standard Messaging Disclosures:

- Message and data rates may apply.
- You can opt out at any time by texting "STOP."
- For assistance, text "HELP" or visit our Privacy Policy (<https://www.alphawealthfunds.com/privacy-policy/>) and Terms and Conditions (<https://www.alphawealthfunds.com/students/terms-conditions>) pages. Message frequency may vary.

Description of the Site

Alpha Wealth Funds's services include emerging hedge funds, separately managed accounts, financial planning, estate & trust services, private placements, and in-house concierge services for high-net-worth individuals, families, and businesses. The Site enables Users to review our services and offerings, find links to our company brochure, request other information, sign up for mailing lists for our messages, newsletters, and/or blogs, contact our staff, request meetings with staff, and access a portal to their personal accounts held by approved custodians.

What Data We Collect

AWF collects Data in several ways. We may market to Users, interact with our participants, and provide services. You voluntarily provide us with Data when you ask to learn more about our programs and services, request to be contacted by our staff, sign up for mailing lists for our messages, newsletters, and/or blogs, enter promotions, download guides, speak to us over live chat, interact with us on our social media channels, order services, talk with us on the phone, watch videos, start an application, and sign up for events and/or mailings. AWF is the controller for the personal information we process. On the Site, we may ask you for information about yourself, such as (but not limited to):

- Contact information (for example: last name, first name, telephone number, email address)
- Family contact information
- Date of birth
- Gender
- Citizenship
- Your browser type
- The type of device used to access the site
- IP address
- Session statistics

If you do not want us to collect this Data directly from you, please do not provide it. Alpha Wealth Funds respects your privacy. AWF established this Privacy Policy so that you can understand the care with which we will treat your Personal Information, including how we collect, share, store, and utilize data.

We ask that you ensure any children under the age of 16 do not send us any Data without your consent. If such Data is sent, please contact us info@alphawealthfunds.com to arrange for this Data to be deleted.

Email & SMS Marketing Policies

We do not send spam or junk emails and our mailing practice conforms to the CAN-SPAM Act of 2003. If you willingly provide AWF with your contact information and opt in to receive notices, you might receive emails or text messages about our products and services as well as general company updates. In some of our email messages or text messages, we may use a “click-through URL” linked to content on the Site. When Users click one of these URLs, they pass through our web server before arriving at the destination web page. We may, now or in the future, track this click-through data to help us determine interest in particular topics and measure the effectiveness of our communications. You have the option to opt out at any time from any and all marketing materials.

How We Collect Data

Use of Cookies

We use “cookies” on our site. A cookie is a packet of data stored on a User’s hard drive that helps us identify repeat visitors to our site and improve User’s access to our site. For instance, when we use a cookie to identify you, you do not have to log in more than once, thereby saving time while on our site. Cookies also enable us to track and target the interests of Users to enhance the experience on our site. Cookies allow us to collect anonymous data such as browser type, device, IP address, referring/exit pages, length of visit, pages viewed, operating system, hardware settings, and referral URL. This Data is collected for all visitors and is non-personally identifiable. It is used to manage, monitor, and track usage to improve our Site’s services. Once this data is collected, it is stored in our web analytics services indefinitely or until we deem it necessary to delete.

If you reside in the European Union, a Cookies Acceptance Banner will appear each time you visit our Site. European residents may choose to opt out of targeting cookies. You may also manually disable Cookies in your browser. Our use of cookies is not linked to any personally identifiable information on our site. If you voluntarily provide AWF with Personal Information, when you are logged in, we store certain User Data from your session using cookies.

Visitor Activity & Log Files

We may collect Data you voluntarily provide to us through the use of:

- Email
- Forms to order a catalog
- Requests for a home visit by one of our representatives
- Information and messages you send or post through our accounts on third party social networks (such as Facebook, Instagram, and Twitter)
- Any comments you post on our Site
- Telephone calls (we may also record your phone number)
- Text messages (we may also record your phone number)
- Contact forms on our website
- At promotional events
- Live Chat – Sales IQ
- Constant Contact and Mailchimp

We may combine Data voluntarily provided with other Data we collect about you per this Privacy Policy. This allows us to respond to your questions and improve our services. Any Data voluntarily submitted will only be shared with relevant AWF team members or third-party processors to follow up with you, provide detailed information, answer your questions, or provide requested marketing or promotional materials.

Custodian Statements

Alpha Wealth Funds does not hold client funds. All money managed by AWF is held by approved custodian firms, including but not limited

to Interactive Brokers, Fidelity, and GoldStar Trust Company. Clients who opt to have money managed by AWF on these platforms do so by voluntarily creating an account. Once a client is signed up for such an account, they will receive statements and notices from the custodian regarding accounts. An account may require information such as (but not limited to): name, email address, birth date, gender, address, schools, parent or legal guardian contact information, income, and more. Both during the application and account creation process and afterward, a custodian firm may request additional data as needed to complete transactions. We ask that children under 16 do not provide any Data to us without parental consent. Email and text message notifications are sent at various intervals to individuals with accounts to help them navigate their account, learn about important updates and opportunities, and get the most out of the platform. To unsubscribe from all AWF email notifications, contact the AWF team at info@alphawealthfunds.com. Communication from custodians is not managed by AWF and opt-in and opt-out must be taken care of through the custodian firm.

Legal Basis for Processing

Consent

Any Data that is voluntarily given to AWF by a User is given with consent. AWF will ask for explicit consent to process certain types of sensitive data such as financial data. Any consent given for the processing of Data may be revoked at any time, barring a legal obligation or legitimate interest to continue the processing or storage of that Data. In compliance with Federal requirements, we retain client Data given through consent for five years after you terminate your account, unsubscribe, contact us, or until we believe you no longer reasonably expect us to retain the data. In the event that you choose to close or terminate your account, or unsubscribe from our email notifications, we may preserve your data for legal or insurance reasons as necessary for up to five years.

Legitimate Interest and Performance of a Contract

We may process Data about you as described in this Privacy Policy when such processing is in our legitimate interests and not overridden by your interests or fundamental rights and freedoms. Our legitimate interests typically include: improving our services, maintaining and enhancing our technology and services, ensuring the security of all User's Data, and ensuring the security of our website. In other cases, we will collect and process Data about you to complete and implement financial and investment plans you have approved; to inform you of upcoming events or new products; or to inform you about new programs that you may be eligible for due to a change in your age range. We retain Data as long as we have an ongoing business relationship with you, a legitimate interest, you remain subscribed or legal need including abiding by federal, state, or local laws and for insurance purposes. Our retention periods will vary depending on the type of Data involved but typically lasts for five years. You can unsubscribe from any newsletter or marketing communication by contacting info@alphawealthfunds.com.

Automatic Profiling

AWF may use an automated method to determine the frequency and type of marketing emails you receive. We utilize information such as email open rates, information about how you found out about AWF, and demographic information such as (but not limited to) age, geographic location, and school in this processing.

Data Sharing, Security, Submission, and Additional Policies

Third Parties

We do not share or sell our subscriber lists with third parties or outside entities other than the service providers listed in this Privacy Policy. All personal Information is kept confidential to our internal team and only viewed by those AWF staff that are necessary. AWF uses certain third-party service providers who perform elements of service for us. These service providers may include, but are not limited to, marketing agencies, database service providers, IT service providers, and email service providers. Access to Data that these companies receive will be limited to Data necessary to fulfill the business-related functions we have engaged them to provide. When we engage another company to perform such business-related functions that may require access to Data, these companies agree by contract to maintain the confidentiality, security, and integrity of such Data in accordance with this privacy policy. This means that they are not permitted to use or share your Data except as permitted by our contract or required by law. Text messaging originator opt-in data and consent will not be shared with any third parties. Except as otherwise stated in this privacy policy, AWF will not disclose Data collected through our Site to any third party unless we believe that disclosure is necessary including the following two scenarios:

1. To meet legal requirements: AWF may be required to provide personal data to comply with legally mandated reporting, subpoenas, court orders, or other legal process requirements.
2. We may use personal data to protect, investigate and deter fraudulent, unauthorized or illegal activity.

Links

Our website may include links to third-party websites (such as Interactive Brokers). Clicking on those links may allow third parties to collect or share Data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Data Security

We use industry-standard measures to protect all information that is stored on our servers and within our database. We limit access to this information to those employees who need access to perform their job functions. Although we work very hard to protect your privacy, no method of electronic storage is 100% secure and we cannot guarantee absolute security. If you have any questions about the security of our website, please contact us at info@alphawealthfunds.com.

Video & Image Submission Policies

When you voluntarily submit videos and images to AWF, you grant us, without any compensation of any kind to you or others, the right and license to use, copy, distribute, display, publish, perform, sell, sublicense, modify, edit, adapt, translate, transmit, create derivative works from, and otherwise use all Images and Videos in any form, medium or technology that we elect, whether now or in the future. Without limiting the foregoing, you agree that, without further approval from you, we may exercise the rights you grant us herein for any and all purposes we deem appropriate, including, without limitation, for the promotion, marketing, and publicizing of our services and products. The right and license you grant us is perpetual, irrevocable, royalty-free, unrestricted, and worldwide.

Promotions

AWF may now or in the future run various Promotions. In some circumstances, Promotions may be promoted on third-party social media platforms (such as Facebook, Instagram, Twitter, or YouTube). Users participating in any of our Promotions may be asked to provide Data including (but not limited to): contact information such as name, parents' name (or legal guardians), address, school and phone number. Any information you provide to us through a promotion is completely voluntary.

Additional Policies

These Terms and Conditions and any other legal notices published by AWF on the Site, shall constitute the entire agreement between you and AWF concerning the Site, your use of the AWF Site, and consumption of any content on the Site. If any provision of these Terms is deemed invalid by a court of competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of these Terms, which shall remain in full force and effect. No waiver of any one provision set forth in these Terms shall be deemed a further or continuing waiver of such provision or any other provision, and AWF's failure to assert or enforce any right or provision under these Terms shall not constitute a waiver of such right or provision.

Indemnification

You agree to indemnify and hold harmless AWF and its principals, shareholders, agents, officers, directors, consultants, and employees from or against third-party claims, damages, payments, deficiencies, fines, judgments, settlements, liabilities, losses, costs, and expenses arising from or relating to any third-party claim, suit, action or proceeding arising out of a breach by the User of AWF representations and warranties contained herein.

Changes to this Privacy Policy

AWF reserves the right to change, modify, add, or remove portions of this Policy at any time. You should visit this page from time to time to review the current Privacy Policy because all of the content on this page is binding when you become a User of AWF. If you object to any such changes or any of the policies outlined above, you may cease using our Site or contact AWF at info@alphawealthfunds.com to determine the best way to proceed. Continued use of AWF, its sites, and any accompanying consent, following notice of any such changes shall indicate your acknowledgment of such changes and agreement to be bound by the terms and conditions of such changes.

Preferences and Opting-Out

AWF offers users options for modifying or removing information from our database. To update, modify or delete such information, contact us at info@alphawealthfunds.com. We will comply with your requests as reasonably as we can. If you are located in the European Union, after May 25, 2018, you have the right to lodge a complaint with a supervisory authority in relation to the processing of your personal information, but we would appreciate the opportunity to speak with you first and resolve your issues.

Your Rights Concerning Data Collected

You have the following rights to your Data:

- Right of access: You have the right to ask us what Data AWF has about you. You also have the right to ask us for copies of your Data
- Right of correction: You have the right to ask us to correct the Data concerning you or ask us to complete information about you that you think is incomplete
- Right of erasure: You have the right to request that AWF erase your Data in certain circumstances
- Right of restriction of processing: You have the right to request that AWF restrict the processing of your information in certain circumstances
- Right of objection to processing: You have the right to object to processing if we are processing your data for a legitimate interest
- Right to portability: You have the right to ask AWF to transmit Data about you that you have given us (identification and control Data exclusively) in an electronic format (.csv file) to another organization or to you.

The exercise of these rights is not absolute, and may be limited for reasons of legitimate interest or legal reasons. You are not required to pay any charge for exercising your rights. We have one month to respond to you.

To exercise your rights to the extent allowed, contact us at info@alphawealthfunds.com.

Contacting Us About Privacy

If you have any questions about the AWF Privacy Policy, please contact us at:

Email: info@alphawealthfunds.com

Phone: 435-658-1934

Toll Free: 866-932-7439

If you are a European Union resident and are dissatisfied with how we are processing your data, you may make a complaint to the United Kingdom's Information Commissioner's Office, <https://ico.org.uk/>.

Terms and Conditions

Alpha Wealth Funds LLC (AWF LLC) is a Registered Investment Adviser. Our services include providing financial and investment advice via our in-house wealth management services and Hedge Fund investment options. There are no fees to site visitors for using our service. An advisor is not a client of the partner(s) referred.

We encourage users to review our [Form ADV Part 2A](#) disclosure brochure before use of our service and before making any investment decisions. Investing in securities involves risks and there is a potential of losing some or all money. Past performance does not guarantee future results.



Code of Ethics

OF

Alpha Wealth Funds, LLC.

**1887 Gold Dust Lane
Suite 203A
Park City, Utah 84060**

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1. General Provisions

1.1 Professional Responsibilities

ALPHA WEALTH FUNDS, LLC (ALPHA WEALTH FUNDS) is registered as an investment adviser with the U.S. Securities and Exchange Commission (SEC). ALPHA WEALTH FUNDS is dedicated to providing effective and proper professional investment management services to a wide variety of advisory clients. ALPHA WEALTH FUNDS's reputation is a reflection of the quality of our employees and their dedication to excellence in serving our clients. To ensure these qualities and dedication to excellence, our employees must possess the requisite qualifications of experience, education, intelligence, and judgment necessary to effectively serve as investment management professionals. In addition, every employee is expected to demonstrate the highest standards of moral and ethical conduct for continued employment with ALPHA WEALTH FUNDS.

The SEC and the courts have stated that portfolio management professionals, including registered investment advisers and their representatives, have a fiduciary responsibility to their clients. In the context of securities investments, fiduciary responsibility should be thought of as the duty to place the interests of the client before that of the person providing investment advice. Failure to do so may render the adviser in violation of the anti-fraud provisions of the Advisers Act.

Fiduciary responsibility also includes the duty to disclose material facts that might influence an investor's decision to purchase or refrain from purchasing a security recommended by the adviser or from engaging the adviser to manage the client's investments. Employees are expected to identify, disclose, and appropriately manage actual or potential conflicts of interest in accordance with the Firm's Compliance Manual and applicable regulatory requirements. The SEC has made it clear that the duty of an investment adviser to not engage in fraudulent conduct includes an obligation to disclose material facts to clients whenever the failure to disclose such facts might cause financial harm. An adviser's duty to disclose material facts is particularly important whenever the advice given to clients involves a conflict or potential conflict of interest between the employees of the adviser and its clients.

As a fiduciary, ALPHA WEALTH FUNDS owes an undivided duty of loyalty to its clients, and thus demands the highest standards of ethical conduct and care by all ALPHA WEALTH FUNDS Personnel. It is ALPHA WEALTH FUNDS policy that all ALPHA WEALTH FUNDS Personnel conduct themselves so as to avoid not only actual conflicts of interest with ALPHA WEALTH FUNDS clients, but also that they refrain from conduct which could give rise to the appearance of a conflict of interest that may compromise the trust our clients have placed in us.

Employees are expected to exercise independent professional judgement when using technology, including artificial intelligence ("AI") tools, and remain responsible for ensuring that all work produced complies with the Firm's fiduciary obligations, confidentiality requirements, and applicable laws and regulations.

This Code of Ethics (or "Code") has been adopted by ALPHA WEALTH FUNDS in order to set forth applicable policies, guidelines and procedures that promote ethical practices and conduct by all of the Firm's managers, officers, employees, and other supervised persons (collectively, these managers, officers and employees are referred to within this section as "employees"). Under Rule 204A-1 of the Investment Advisers Act of 1940, ALPHA WEALTH FUNDS is required to establish, maintain and enforce written procedures reasonably necessary to prevent its employees from violating provisions of the Act with respect to personal securities trading and fiduciary obligations. In meeting such responsibilities with our clients, ALPHA WEALTH FUNDS has adopted this Code of Ethics regarding the purchase and/or sale of securities in the personal accounts of our employees or in those accounts in which our employees may have a direct or indirect beneficial interest. The Code is also intended to lessen the chance of any misunderstanding between ALPHA WEALTH FUNDS and our employees concerning personal trading activities.

In those situations where employees may be uncertain as to the intent or purpose of this Code, they are advised to consult with the Chief Compliance Officer (CCO), other designated member of senior management, or Owner, Chase Thomas. The CCO may grant exceptions to specific provisions of this Code only when consistent with the Firm's fiduciary obligations, applicable law, and the best interest of clients. Any approved exception shall be documented. All questions arising in connection with personal securities trading should be resolved in favor of the interest of the clients even if it may not align with the employee's personal interests. The CCO shall periodically review compliance with this Code and report material violations or trends to senior management, together with any recommended corrective actions.

1.2 Failure to Comply

Strict compliance with this Code shall be considered a fundamental condition of employment with ALPHA WEALTH FUNDS. It is important that employees understand the reasons for compliance with this Code. ALPHA WEALTH FUNDS's reputation for fair and honest dealing with its clients and the investment community in general could be seriously damaged as the result of even a single security transaction considered questionable in light of the fiduciary duty owed to our clients. Employees are expected to consult the CCO for any questions as to

the application of this Code to their individual circumstances. Employees should also understand that a material breach of the provisions of this Code may result in disciplinary action, including additional training, written warnings, suspension of responsibilities, financial penalties where permitted, termination of employment or association with the Firm, or other corrective action deemed appropriate under the circumstances.

All employees are required to acknowledge the receipt of this Code upon hire and periodically thereafter, as determined by the CCO, and to certify their compliance when requested by the Firm.

2. Covered Persons

2.1 Supervised Persons

The following individuals are considered Supervised Persons under this Code:

- Directors, officers, and partners of the Firm (or other persons occupying a similar status or performing similar functions);
- All full-time, part-time, and temporary employees of the Firm;
- Any other person who provides investment advice on behalf of the Firm and is subject to the Firm's supervision and control;
- Temporary workers;
- Consultants and independent contractors who perform services on behalf of the Firm and are subject to the Firm's supervision and control; and,
- Access persons, as defined below.

2.2 Access Persons

An Access Person is any Supervised Person who:

- Has access to non-public information regarding any client's purchase or sale of securities, or non-public information regarding the portfolio holdings of any fund managed by the Firm or its affiliates;
- Is involved in making securities recommendations to clients, or has access to such recommendations that are non-public; or,
- Is a director, officer, or partner of ALPHA WEALTH FUNDS.

Any Supervised Person who is uncertain whether they qualify as an Access Person should consult the CCO. The CCO will make final determination and maintain documentation of such determinations, as appropriate. The CCO is responsible for identifying Access Personnel upon hire and periodically thereafter. Changes in an individual's responsibilities or access to confidential information may result in a change to their status under this Code.

2.3 Family Members and Related Accounts

For purposes of the personal securities reporting requirements contained in this Code, Access Persons are responsible for reporting securities accounts and transactions in which they have a direct or indirect beneficial interest. This includes but is not limited to, accounts held by an immediate family member sharing the same household, joint accounts, trusts, custodial accounts, partnerships, limited liability companies, or any other account over which the Access Person exercises investment direction or beneficial ownership. Questions regarding whether an account is reportable should be directed to the CCO before the reporting deadline.

3. Business Conduct Standards

3.1 Compliance with Laws and Regulations

All Supervised Persons must comply with all applicable state and federal securities laws including, but not limited to, the Investment Advisers Act of 1940, Regulation S-P (Privacy of Consumer Financial Information) and the applicable anti-money laundering, sanctions, and financial-crime requirements. No Supervised Person is permitted, in connection with the purchase or sale, directly or indirectly, of a security held or to be acquired by a client:

- To defraud such client in any manner;
- To mislead such client, including by making a statement that omits material facts;
- To engage in any act, practice or course of conduct which operates or would operate as a fraud or deceit upon such client;
- To engage in any manipulative practice with respect to such client; or
- To engage in any manipulative practice with respect to securities, including price manipulation.

3.2 Conflicts of Interest

ALPHA WEALTH FUNDS, as a fiduciary, has an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of its clients. Compliance with this duty can be achieved by trying to avoid conflicts of interest and by fully disclosing all material facts concerning any conflict that does arise with respect to any client. All material conflicts of interest will be fully and fairly disclosed to affected clients in writing, in accordance with the Firm's fiduciary obligations.

Conflicts among Client Interests: Conflicts of interest may arise in which the firm or its Supervised Persons have reason to favor the interests of one client over another client (e.g., larger accounts over smaller accounts, accounts compensated by lower ticket charges to the Investment Adviser Representative ("IAR") over accounts not so compensated, accounts in which employees have made material personal investments, accounts of close friends or relatives of supervised persons). ALPHA WEALTH FUNDS specifically prohibits inappropriate favoritism of one client over another client which would constitute a breach of fiduciary duty.

Trade Allocation and Order Execution Process: ALPHA WEALTH FUNDS utilizes a centralized trading function in which designated trading representatives are responsible for placing trades on behalf of all client accounts. Client accounts are generally traded in the order in which they are displayed within the applicable custodian trading platform. The Firm does not intentionally prioritize accounts based on client identity, account size, fee arrangement, ownership, or whether an account belongs to a Supervised Person. Because account ordering and execution may vary based on the applicable platform, strategy, trade type, or other operational considerations, individual accounts may receive different execution prices. The Firm seeks to administer its trading practices fairly and equitably and without systematically favoring one client or group of clients over another.

Competing with Client Trades: ALPHA WEALTH FUNDS prohibits Access Persons from using knowledge about pending or currently considered securities transactions for personal benefit. Accounts in which Supervised Persons have a beneficial interest may participate in the same investment strategies and may be traded alongside client accounts, provided such accounts are subject to the Firm's established trading and allocation procedures and are not intentionally given preferential treatment. The CCO will periodically review personal trading activity for potential conflicts of interest or preferential treatment and may require corrective action when appropriate.

No Transactions with Clients: ALPHA WEALTH FUNDS specifically prohibits Supervised Persons from knowingly selling to or purchasing from a client any security or other property, except securities issued by the client.

3.3 Personal Securities Transactions

Personal securities transactions by Access Persons are subject to the following trading restrictions:

Initial Public Offerings (IPO): Access persons are prohibited from acquiring any securities in an IPO without first obtaining written pre-clearance from the CCO. The prior approval must take into account, among other factors, whether the investment opportunity should be reserved for clients, and whether the opportunity is being offered to an individual by virtue of their position with ALPHA WEALTH FUNDS. Upon receiving a request for pre-clearance, the CCO will review the intended transaction for consideration. The final decision will then be sent in writing to the access person requesting the permission for the IPO. Only upon receipt of the written approval from the CCO can the access person then engage in the purchase of the requested IPO. The access person making the request and the CCO must maintain final written approval or denial for their files.

Limited or Private Offerings: Access Persons are prohibited from acquiring any securities in a limited offering (i.e., private placement) without first obtaining written pre-clearance from the CCO. The prior approval must take into account, among other factors, whether the investment opportunity should be reserved for clients and whether the opportunity is being offered to the individual by virtue of their position with ALPHA WEALTH FUNDS. However, this pre-clearance requirement does not apply to investments in private funds managed or advised by Alpha Wealth Funds, LLC. Access Persons are permitted to invest in Alpha Wealth Funds' proprietary funds without written approval, provided such investment does not create a conflict of interest and is disclosed in accordance with the Firm's reporting requirements. For all other private placements, upon receiving a request, the CCO will review the intended transaction for consideration. The final decision will be sent in writing to the Access Person. Only upon receipt of written approval from the CCO may the Access Person proceed with the investment. Both the requesting Access Person and the CCO must maintain final written approval or denial for their records.

Reporting Personal Securities and Transactions: Access Persons must submit an initial holdings report to the CCO or other designated person no later than 10 days after becoming an Access Person, and the information contained in the report must be

current as of a date no more than 45 days prior to becoming an Access Person. Access Persons must thereafter submit a quarterly transaction report no later than 30 days after the end of each calendar quarter and an annual holdings report, with information current as of a date no more than 45 days before the report is submitted. The CCO or other designated person shall review these reports for compliance with this Code.

3.4 Outside Business Interests

A Supervised Person who seeks or is offered a position as an officer, trustee, director, or is contemplating employment in any other capacity in an outside enterprise is expected to discuss such anticipated plans with ALPHA WEALTH FUNDS CCO prior to accepting such a position. Information submitted to the CCO will be considered as confidential and will not be discussed with the Supervised Person's prospective employer without the Supervised Person's permission. All outside business activities must receive prior approval from the CCO. Supervised Persons are responsible for promptly notifying the CCO of any material change to a previously approved outside business activity.

ALPHA WEALTH FUNDS does not wish to limit any Supervised Person's professional or financial opportunities, but needs to be aware of such outside interests so as to avoid potential conflicts of interest and ensure that there is no interruption in services to our clients.

Understandably, ALPHA WEALTH FUNDS must also be concerned as to whether there may be any potential financial liability or adverse publicity that may arise from an undisclosed business interest by a Supervised Person.

3.5 Personal Gifts

ALPHA WEALTH FUNDS maintains a high standard of integrity in all client and vendor relationships. The purpose of this policy is to avoid even the appearance of impropriety or conflict of interest that may arise from the giving or receiving of gifts or entertainment. Supervised Persons may give or receive reasonable and customary business gifts provided that such gifts are not intended to influence decision-making, obtain preferential treatment, reward a referral or recommendation in violation of applicable law, or otherwise create an actual or apparent conflict of interest.

1. **Accepting Gifts:** On occasion, because of their position with ALPHA WEALTH FUNDS, Supervised Persons may be offered, or may receive without notice, gifts from clients, brokers, vendors, or other persons doing business with the Firm. Acceptance of gifts must not impair a Supervised Person's objectivity, or create the appearance of impairing a Supervised Person's ability to act in the best interests of the firm and its clients.

Permitted Gifts: Supervised Persons may accept reasonable and customary business gifts of nominal value, defined as \$250 or less in aggregate from any one source over a 12-month period without prior approval from the CCO. Gifts exceeding this amount must be reported to and approved by the CCO. Gifts that are lavish, excessive, inappropriate, or reasonably likely to create an actual or perceived obligation or conflict of interest are prohibited regardless of value. Permitted gifts may include customary items such as:

- Holiday Baskets
- Branded merchandise (pens, mugs, t-shirts)
- Flower or celebratory items
- Modest thank-you gifts

Required Disclosure: Any gift exceeding \$250 (or of unknown value) must be promptly reported to the CCO and may be subject to refusal or return at the Firm's discretion.

Cash or Cash Equivalents: Supervised Persons may not accept cash, checks, gift cards, or any equivalent form of payment under any circumstances.

2. **Providing Gifts:** Supervised Persons may provide reasonable and customary business gifts to clients, prospective clients, referral partners, vendors, or other business relationships. Gifts should be appropriate to the nature of the relationships and occasion and must not be intended to improperly influence the recipient or create an actual or perceived obligation.

Supervised Persons may provide gifts having an aggregate value of up to \$250 per recipient during a calendar year without prior CCO approval. Gifts that would cause the annual amount provided to a recipient to exceed \$250 require prior CCO approval.

The \$250 annual limit is a compliance threshold and is not intended to establish an expected level of gifting. Employees should exercise reasonable judgment and select gifts appropriate to the occasion. As a general guideline:

- Routine meeting follow-up or appreciation: A personalized card is generally appropriate. A nominal gift may be

included where appropriate.

- Birthdays, new-client recognition, anniversaries, or other relationship milestones: A personalized card or modest customized gift, generally valued at approximately \$30-\$50, may be appropriate.
- Retirement, significant personal or professional milestones, or other notable occasions: A customized gift generally valued at approximately \$50-\$75 may be appropriate
- Exceptional or significant milestones: A more substantial or personalized gift valued up to approximately \$100 may be appropriate when warranted by the circumstances.
- Special Circumstances: A fully customized gift may be selected for unique or significant circumstances. Employees should consider the recipient, occasion, relationship, prior gifts during the calendar year, and overall reasonableness of the gift. Prior CCO approval is required if the gift would cause the annual gift limit to be exceeded.

Employees are encouraged to include a personalized card or message with gifts. The Firm may maintain approved gifting vendors and options to facilitate consistent application of these guidelines.

Permitted Gifts: Subject to the limitations above, reasonable and customary gifts may include:

- Personalized cards or correspondence;
- Food items, gift baskets, flowers, or similar customary gifts;
- Modest customized gifts recognizing birthday, retirements, anniversaries, or other personal or professional milestones;
- Promotional items of nominal value displaying the Firm's or another company's logo;
- Gifts associated with customary business or holiday occasions; and
- Other reasonable gifts approved by the CCO where appropriate.
- Flower or celebratory items
- Modest thank-you gifts

Prohibited Gifts: Supervised Persons may not give or accept:

- Cash or cash equivalents, except as specifically approved by the CCO;
- Gifts intended to improperly influence a client, prospect, vendor, referral source, or other person;
- Gifts that are lavish, excessive, inappropriate, or reasonably likely to create the appearance of a conflict of interest;
- Gifts conditioned upon an investment, account opening, referral, testimonial, endorsement, or other business activity unless reviewed and approved by the CCO for compliance with applicable law; or
- Gifts to government officials or other persons subject to special legal or regulatory restrictions without prior CCO approval.

3. **Meals and Entertainment:** Reasonable and customary business entertainment - such as meals, sporting events, cultural events, or other activities - are permitted when there is a legitimate business purpose and the employee and the client, prospect, vendor, or other business contact attend the event. Meals and entertainment should be reasonable in frequency and cost and may not be so lavish or excessive as to create an actual or perceived conflict of interest.

- Ordinary business meals and entertainment where the host is present are generally not treated as gifts for purposes of the annual gift limit. If the host does not attend, tickets, meals, or other items provided to the recipient may be considered gifts and are subject to the applicable gift limits.

Entertainment of significant value or perceived extravagance must be pre-cleared with the CCO. Examples requiring pre-clearance may include:

- Travel and lodging
- Tickets to high-profile or luxury events
- Golf outings with expensive accommodations

4. **Charitable Donations:** Supervised Persons may not solicit donations from vendors, clients, or prospective clients on behalf of charitable organizations in a manner that could be perceived as coercive or tied to the Firm's business interests. Charitable contributions made on behalf of a client or at their request must be disclosed to the CCO and must not be used to curry favor or reward business decisions.

6. **Referral, Testimonials, and Promotional Gifts:** A gift provided in connection with a referral, testimonial, endorsement,

solicitation, promotional campaign, or similar activity may constitute cash or non-cash compensation under applicable regulatory requirements. Such gifts or programs must be reviewed and approved by the CCO prior to implementation and, where applicable, must comply with the Firm's Marketing and Referral Policies. A gift that is simply provided as a customary expression of appreciation and is not conditioned upon or provided in exchange for a referral or endorsement will be evaluated based on the facts and circumstances.

7. *Prohibited Practices*

- Soliciting gifts of any value is strictly prohibited.
- Accepting or offering gifts or entertainment during a procurement, contract negotiation, or due diligence process is prohibited unless pre-approved by the CCO.
- Circumventing gift limitations through third-party arrangements or family members is not permitted.

8. *Recordkeeping and Oversight*

Supervised Persons are responsible for monitoring gifts given and received and for complying with the Firm's applicable reporting procedures. The CCO may require gifts to be recorded in the Firm's Gift and Entertainment Log and may request information regarding the recipient, occasion, approximate value, and business purpose.

Any gift exceeding the applicable annual limit, or any gift for which a Supervised Person is uncertain as to its appropriateness, must be submitted to the CCO for review prior to giving or, when prior approval is not practicable for a gift received, promptly following receipt.

Gifts between family members or gifts that are clearly personal in nature and unrelated to Firm business are not subject to this policy.

- All reportable gifts and entertainment must be documented and reviewed by the CCO.
- The CCO shall maintain a gift and entertainment log tracking the nature, date, estimated value, involved parties, and purpose.
- The CCO will review this log at least annually to identify potential patterns or risks.

3.6 Political Contributions

ALPHA WEALTH FUNDS has adopted policies and procedures regarding political contributions in order to comply with Rule 206(4)-5 under the Investment Advisers Act of 1940 (the "Pay-to-Play Rule"). The Rule is designed to prevent investment advisers and certain of their personnel from using political contributions to influence the selection or retention of investment advisers by government entities.

Covered Associates: For purposes of this policy, "Covered Associates" include the Firm's executive officers and other individuals with similar status or functions, employees who solicit government entities on behalf of the firm, persons who directly or indirectly supervise such employees, and any political action committee controlled by the firm or a Covered Associate.

Political Contributions: Covered Associates may make personal political contributions, provided such contributions comply with Rule 206(4)-5 and this policy. Under the Rule's de minimis exceptions, a Covered Associate may generally contribute up to \$350 per election to an official or candidate for whom the Covered Associate is entitled to vote and up to \$150 per election to an official or candidate for whom the Covered Associate is not entitled to vote, without triggering the Rule's two-year compensation prohibition.

Prior Approval and Reporting: Covered Associates must disclose proposed political contributions to the CCO and obtain prior approval before making a contribution to a state or local government official, candidate, political party, political action committee, or other political organization where the contribution may implicate the Pay-to-Play Rule. The CCO will review the proposed contribution based on the recipient, amount, Covered Associate's voting eligibility, the Firm's existing or prospective government entity relationships, and any applicable federal, state, or local requirements.

Solicitation and Coordination: Covered Associates may not solicit or coordinate political contributions or payments where such activity would be prohibited by Rule 206(4)-5. No Supervised Person may directly or indirectly take any action intended to circumvent this policy, including making a prohibited contribution through another person or entity.

Government Entity Business: If a political contribution may implicate Rule 206(4)-5, the CCO will determine whether the contribution could affect the Firm's ability to receive compensation for advisory services provided to a government entity. Certain contributions may result in a two-year prohibition on the Firm receiving compensation from the affected government entity.

New Covered Associates: The Firm may review political contributions made by an individual prior to becoming a Covered

Associate when required to determine whether prior contributions would affect the Firm's ability to provide compensated advisory services to a government entity. The applicable look-back may be up to two years depending upon the individual's responsibilities.

Records: The CCO will maintain records of political contributions and related approvals as required by applicable law and the Firm's recordkeeping policies.

3.7 Proprietary Trading

ALPHA WEALTH FUNDS shall not engage in proprietary trading for its own account unless such trades are incidental, necessary for error correction, or otherwise permitted under applicable law and approved by the CCO.

3.8 Technology and Cybersecurity Standards

All Supervised Persons must comply with the Firm's Cybersecurity Policy, Privacy Policy, and applicable technology procedures when accessing Firm systems, client information, or conducting Firm business. Supervised Persons using personal devices for firm business must comply with the firm's BYOD and information-security requirements and may use only approved systems and technologies for Firm information.

3.9 Reporting of Violations

All Supervised Persons of ALPHA WEALTH FUNDS must promptly (upon discovery of violation) report violations of the code to the CCO as the situation dictates. If the CCO is unavailable, the violation must then be reported to any executive officer of the firm. Reports may be made confidentially, and no Supervised Person will face retaliation for good-faith reporting of an actual or suspected violation.

4. Insider Trading

ALPHA WEALTH FUNDS strictly prohibits any Supervised Person from trading securities while in possession of material non-public information ("MNPI") or from communicating such information to others who may trade on the basis of that information (also known as "tipping"). This policy is designed to comply with Section 204A of the Investment Advisers Act of 1940 and applicable federal securities laws.

Material non-public information is defined as:

- Material: Information is material if a reasonable investor would consider it important in making an investment decision, or if it is likely to affect the price of a security.
- Non-public: Information is non-public if it has not been widely disseminated through public channels, such as press releases, newswires, or SEC filings, and is not generally available to the market.

Examples of potentially material non-public information include (but are not limited to):

- Earnings results not yet released;
- Merger or acquisition discussions;
- New product announcements;
- Regulatory approvals or investigations;
- Changes in senior management;
- Significant pending securities transactions or financing activity;
- Material changes in financial condition;
- Material litigation or significant corporate developments;
- Nonpublic information received from clients, issuers, consultants, vendors, or other third parties; and
- Any other nonpublic information that a reasonable investor would consider important in making an investment decision.

Supervised persons who know or reasonably believe they may be in possession of MNPI must immediately notify the CCO and must refrain from trading on, recommending, or causing others to trade in any affected security until the CCO determines that trading may resume. Supervised Persons must not disclose MNPI to any other person except as specifically authorized by the CCO or as necessary in the performance of their authorized Firm responsibilities. If a Supervised Person inadvertently receives information that may constitute MNPI,

the information must not be forwarded, discussed, or otherwise disseminated, and the CCO should be notified promptly.

Engaging in insider trading may subject individuals to severe civil and criminal penalties, including fines and imprisonment, as well as disciplinary action by the Firm, up to and including termination.

Although insider trading is addressed under this Code of Ethics, the Firm has also adopted a separate Insider Trading Policy and Procedures in accordance with Rule 204A-1 and Section 204A. These procedures are included as Exhibit A to this Code. All Supervised Persons are required to read, understand, and certify their annual review of these procedures.

5. Reporting Requirements

5.1 Scope

The provisions of this Code apply to every Reportable Security transaction, in which an Access Person of ALPHA WEALTH FUNDS has, or by reason of such transaction acquires, any direct or indirect beneficial interest. An Access Person is regarded as having a beneficial interest in those securities held in:

- Their own name;
- The name of their spouse or domestic partner;
- The names of their minor children who reside with them;
- Any account or entity from which they receive economic benefits substantially equivalent to ownership (e.g. trust, partnerships, corporations, custodian, or another entity).

An access person does not derive a beneficial interest by virtue of serving as a trustee or executor unless the person, or a member of their immediate family, has a vested interest in the income or corpus of the trust or estate. If an access person believes that they should be exempt from the reporting requirements with respect to any account in which they have direct or indirect beneficial ownership, but over which they have no direct or indirect control in the management process, they must submit a written request to the CCO, detailing:

- The name of the account,
- The person(s) or firm(s) responsible for its management, and
- The reason for believing that they should be exempt from reporting requirements under this Code.

5.2 Reportable Securities

For the purposes of this Code, “Reportable Securities” include all securities as defined under Section 202(a)(18) of the Advisers Act, except:

- Direct obligations of the U.S. government;
- Bankers’ acceptances, certificates of deposit, commercial paper and high quality short-term debt instruments (including repurchase agreements);
- Shares of money market funds;
- Shares issued by open-end funds other than “Reportable Funds” (*Note:* The term “Reportable Funds” means any fund whose investment adviser or principal underwriter controls you, is controlled by you, or is under common control with you.); and,
- Shares issued by unit investment trusts that are invested exclusively in one or more open-end funds, none of which are reportable funds.

If there is any question by an access person as to whether a security is reportable under this Code, they should consult with the CCO for clarification on the issue before entering any trade for their personal account.

5.3 Reporting Exceptions

Under Rule 204A-1, access persons are not required to submit:

- Reports with respect to securities held in accounts over which the access person has no direct or indirect influence or control;
- Transaction reports with respect to transactions effected pursuant to an automatic investment plan (*Note:* This exception includes dividend reinvestment plans.); and,
- Transaction reports if the report would duplicate information contained in broker trade confirmations or account statements that ALPHA WEALTH FUNDS holds in its records so long as ALPHA WEALTH FUNDS receives the confirmations or statements no later than 30 days after the end of the applicable calendar quarter.

5.4 Initial/Annual Holdings Report

Initially

Any employee of ALPHA WEALTH FUNDS who during the course of their employment becomes an Access Person, must provide the CCO with an Initial Securities Holdings Report Certification no later than 10 days after the employee becomes an Access Person. The holdings information provided in conjunction with this certification must be current as of 45 days before the employee became an Access Person.

Annually

Every Access Person must submit an updated Securities Holdings Report to the CCO due by the last business day of January of each year. The annual holdings requirement may be satisfied through the Access Person's fourth-quarter reporting and accompanying year-end brokerage or custodial statements, provided the documentation contains all information required for the annual holdings report, identifies all applicable securities accounts, and includes all Reportable Securities. The information must be current as of a date not more than 45 days before submission. Any Reportable Securities or accounts not reflected on the statements must be separately reported by the Access Person. The CCO will review each statement for any evidence of improper holdings, trading activities, or conflicts of interest by the Access Person.

5.5 Quarterly Transaction Reports

Every Access Person must submit to the CCO a Quarterly Transaction report no later than 30 days after the end of each calendar quarter. This report must include all Reportable Securities transactions in which the Access Person had any direct or indirect beneficial ownership during the quarter. The quarterly transaction reporting requirement may be satisfied through broker or custodial statements received by the Firm no later than 30 days after the end of the applicable calendar quarter, provided the statements contain all information required under this section. Any Reportable Securities transactions not reflected on such statements must be separately reported by the Access Person. Each Quarterly Transaction Report must contain the following information for each transaction:

- The date of the transaction;
- The title and type of security;
- The ticker symbol or CUSIP number (if available);
- The number of shares or units and the principal amount involved;
- The nature of the transaction (purchase, sale, or other);
- The price at which the transaction was effected; and
- The name of the broker, dealer, or bank through which the transaction was effected.

Access Persons must also report any account established during the quarter in which securities are held for their direct or indirect benefit, including the name of the broker, dealer, or bank and the date the account was established.

Access Persons are not required to separately provide account statements or transaction information that is already maintained in the firm's records and available to the CCO, provided such records contain the information required by this Code.

The CCO will review each Quarterly Transaction Report to identify any evidence of improper trading or conflicts of interest. The CCO will document the review by signing and dating each report. All reports and records of review will be maintained in accordance with the recordkeeping requirements of Rule 204-2(a)(12) under the Advisers Act.

6. Form ADV Disclosure

A description of this Code of Ethics is included in ALPHA WEALTH FUNDS Form ADV Part 2A, Item 11. The Firm will provide a copy of the full Code of Ethics to any client or prospective client upon request, free of charge, in accordance with applicable requirements under the Investment Advisers Act of 1940.

7. Acknowledgment of Receipt & Recordkeeping

All Supervised Persons of ALPHA WEALTH FUNDS must acknowledge, initially and annually thereafter, that they have received, read, understand, and agree to comply with the Firm's Code of Ethics and Compliance Manual, including provisions relating to personal securities trading, potential conflicts of interest, and other compliance responsibilities.

Supervised Persons must also acknowledge any material amendments to the Code within the time frame designated by the Firm.

The CCO will maintain copies of all acknowledgements, certifications, and related records in accordance with Rule 204-2 under the Investment Advisers Act of 1940 and the Firm's recordkeeping policies.



Insider Trading Policies

OF

Alpha Wealth Funds, LLC.

**1887 Gold Dust Lane
Suite 203A
Park City, Utah 84060**

Overview and Purpose

The purpose of the policies and procedures in this Section (the “Insider Trading Policies”) is to detect and prevent “insider trading” by any person associated with Alpha Wealth Funds, LLC (“ALPHA WEALTH FUNDS”). These Insider Trading Policies supplement and form part of ALPHA WEALTH FUNDS Code of Ethics. The term “insider trading” is not defined in the securities laws, but generally refers to the use of *material, non-public information* to trade in securities or the communication of material, non-public information to others. These Insider Trading Policies are adopted in accordance with Section 204A of the Investment Advisers Act of 1940, which requires investment advisers to establish, maintain, and enforce written policies and procedures reasonably designed to prevent the misuse of material, non-public information.

General Policy

a. Prohibited Activities

All ALPHA WEALTH FUNDS personnel are prohibited from engaging in the following activities:

- i. Trading, recommending, or causing another person to trade in securities for any account (personal, client, or otherwise) while in possession of material, non-public information relating to the issuer of the securities; or
- ii. Communicating material, non-public information to any other person except as necessary and authorized in connection with legitimate Firm business.

The activities described above are not only violations of these Insider Trading Policies, but also may be violations of applicable law.

b. Reporting of Material, Non-Public Information

All ALPHA WEALTH FUNDS personnel who possess or believe that they may possess material, non-public information about any issuer of securities must report the matter immediately to the Chief Compliance Officer (CCO). The CCO will review the matter and provide further instructions regarding appropriate handling of the information to the reporting individual. Until the CCO provides further instruction, the individual must not trade, recommend, or cause trading in the affected security and must not further disclose or disseminate the information.

Material, Non-Public Information (MNPI)

a. Material Information

“Material information” generally includes:

- i. Any information that a reasonable investor would likely consider important in making his or her investment decision; or
- ii. Any information that is reasonably certain to have a substantial effect on the price of an issuer’s securities.

Examples of material information include the following: dividend changes, earnings estimates, changes in previously released earnings estimates, significant merger or acquisition proposals or agreements, major litigation, significant liquidity issues or bankruptcy risk, and extraordinary management developments.

Examples of circumstances that should be reported to the CCO include, but are not limited to, conversations with public-company executives or other insiders; receipt or review of confidential offering materials; access to pre-release earning, financial, or performance information; information obtained through consultants, vendors, clients, professional advisers, or other third parties; or any other situation in which a Supervised Person reasonably believes they may have received MNPI.

b. Non-Public Information

Information is generally considered public when it has been broadly disseminated through recognized public channels, such as SEC filings, issuer press releases, widely available news services, or other means reasonably designed to make the information available to the investing public, and sufficient time has passed for the market to absorb the information.

If the CCO determines that information may constitute MNPI, the CCO may restrict trading in the affected security, place the issuer or

security on a restricted or watch list, establish information barriers, limit access to the information to personnel with a legitimate business need, or take other measures reasonably designed to prevent misuse of the information. Any restrictions will remain in effect until removed by the CCO.

Insider Trading and Insiders

a. Insider Trading

While the law concerning “insider trading” is not static, it generally prohibits:

- i. Trading by an insider while in possession of material, non-public information;
- ii. Trading by non-insiders while in possession of material, non-public information, where the information was either disclosed to the non-insider in violation of an insider’s duty to keep it confidential or was misappropriated; and,
- iii. Communicating material, non-public information to others.

b. Insiders

The concept of “insider” is quite broad, and includes all employees of a company. In addition, any person may be a temporary insider if they enter into a special, confidential relationship with a company in the conduct of that company’s affairs and, as a result, has access to information solely for the company’s purposes. Any person associated with ALPHA WEALTH FUNDS may become a temporary insider for a company it advises or for which it performs other services. Temporary insiders may also include the following: a company’s attorneys, accountants, consultants, bank lending officers, investment advisers, financial advisers, vendors, other persons who receive confidential information in connection with providing services to an issuer, and the employees of such organizations.

Penalties for Insider Trading

The legal consequences for trading on, or communicating, material, non-public information are severe, both for individuals involved in such unlawful conduct and their employers. A person can be subject to some or all of the penalties below, even if they do not personally benefit from the violation. Penalties may include:

- Civil injunctions;
- Disgorgement of profits or losses avoided;
- Substantial civil monetary penalties;
- Criminal fines and imprisonment;
- Bars or restrictions from participating in the securities industry; and
- Other regulatory sanctions.

In addition, ALPHA WEALTH FUNDS management may impose disciplinary action for violations of this Policy, including additional training, suspension of trading privileges, or responsibilities, written warning, reassignment, or termination of employment or association with the Firm.

Recordkeeping

ALPHA WEALTH FUNDS will maintain records related to this Insider Trading Policy to meet SEC requirements and demonstrate compliance. The following records will be kept for at least five years, with the first two years maintained in an easily accessible place, as required by applicable recordkeeping requirements. These records may be in the firm’s principal office or approved cloud-based system:

- Acknowledgments from Supervised Persons that they have received and understood the Insider Trading Policy (initial and annual).
- Any reports made to the CCO regarding material, non-public information or suspected insider trading.
- Notes from any internal review, investigations, or actions taken in response to a reported concern.
- Documentation of employee training or updates to the Insider Trading Policy.

- Any restricted lists or other controls implemented to manage access to material non-public information.

The Chief Compliance Officer is responsible for ensuring these records are accurate, complete, and stored securely.

CCO Review and Documentation

Upon reviewing a report of actual or potential MNPI, the CCO will evaluate the circumstances and determine whether trading restrictions, information barriers, restricted-list placement, additional investigation, consultation with legal counsel, or other measures are appropriate. The CCO will document material MNPI reviews and any restrictions or other action taken, as appropriate.

Alpha Wealth Funds, LLC
Code Of Ethics Acknowledgement and Certification

The undersigned Supervised Person of ALPHA WEALTH FUNDS, LLC, _____, hereby certifies the following:

I acknowledge that I have received, read, and understand the Alpha Wealth Funds, LLC Code of Ethics, including any amendments provided to me and the provisions relating to personal securities trading and conflicts of interest, gifts, outside business activities, and other responsibilities applicable to me.

I certify that, to the best of my knowledge, I have complied with the Code of Ethics and have disclosed all information required under the code, including applicable personal securities accounts, holdings, transactions, outside business activities, gifts, and other potential conflicts of interest.

I agree to promptly report to the CCO any known or suspected violation of the Code and to seek guidance from the CCO if I am uncertain about the application of the Code to any activity or circumstance.

Certification Type:

- ☐ Initial
- ☐ Annual
- ☐ Amendment

Dated as of : _____

Signature: _____

Print Name: _____