Optima Asset Financial Services LLC

# Compliance and Investor Communication Policy

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## 1. Purpose

**The purpose of this policy is to define the standards governing interactions between investors and Optima Asset personnel, including but not limited to account managers, service providers, and representatives of the firm. Optima Asset is committed to maintaining the highest standards of legal and ethical conduct, ensuring investor protection, regulatory compliance, and preservation of operational integrity.**

**This policy establishes the prohibition of unscheduled or personal meetings between individual investors and Optima Asset personnel. It further defines controlled, compliant exceptions for specific institutional or business reasons under applicable U.S. law and regulatory standards.**

## 2. Scope

**This policy applies to all:**

- Investors and prospective investors affiliated with Optima Asset.
- Employees, contractors, account managers, representatives and service providers acting on behalf of Optima Asset.
- All forms of communication and engagement, including physical meetings, unscheduled face-to-face interactions, off-site encounters, and informal gatherings that constitute a "meeting" under this policy.

**This policy governs interactions regardless of location and includes both domestic (U.S.) and international engagements unless specific local rules require additional documentation or approvals.**

## 3. Policy Statement

### 3.1. Prohibition of Personal Meetings

**1. General Rule:**
All personal, or request-based physical meetings between individual investors and their assigned account managers, service providers, or any Optima Asset personnel are strictly prohibited.

**2. Rationale:**

- Personal meetings between investors and firm personnel create compliance and legal risk, including potential perceptions of preferential access, material non-public information exchange, solicitation, or unauthorized investment advice.

- Protecting investor interests and preventing reputational, legal, or regulatory exposure are core responsibilities of Optima Asset under U.S. securities laws and industry regulations.

- Unscheduled meetings can lead to inadvertent violations of rules governing communications about financial products, trading activities, or confidential client information.

## 4. Regulatory Context:

Under U.S. securities regulation, firms and associated persons are obligated to comply with standards designed to protect investors, including:

• **Securities Exchange Act of 1934,** which governs fair communication and prohibits misleading or manipulative conduct.

• **FINRA,** which mandate controls over communications and supervisory obligations of firms and registered representatives.

• **SEC Regulatory Framework,** reinforcing the need for controlled, documented interactions with investors to mitigate risk and ensure consistent disclosures.

### 4.1. Prohibited Conduct

The following are specifically prohibited unless conducted in accordance with an approved exception:

• Unsanctioned face-to-face meetings at public or private locations.
• Meetings initiated by investors outside of scheduled, documented business processes.
• Informal or social meetings that involve substantive discussion of investment positions, strategies, or account-specific information.
• Off-site meetings that cannot be verified, documented, or supervised by compliance.

Any deviation exposes Optima Asset, its personnel, and the investor to legal and regulatory concerns and will be treated as a serious compliance violation.

## 5. Permissible Exceptions

Meetings not covered by the general prohibition may be permitted only with prior written approval from the Compliance Department under the following limited categories:

### 5.1. Institutional / Prime Client Meetings

Allowed where there is a documented and legitimate business purpose, including but not limited to:

• Institutional investors, including regulated funds, asset managers, family offices, and corporate entities operating at a institutional-grade investment activity.
• Transactions involving transactions exceeding internally defined materiality thresholds, strategic allocations, or structured financial instruments.
• Engagements requiring formal governance discussions, audit-related reviews, or regulatory disclosures.
• Situations requiring formal, documented meetings for regulatory, audit, or governance purposes.

## 6. Business Partnership and Strategic Cooperation

Optima Asset may conduct meetings with regulated partners or entities where cooperation serves:

- Approved business development initiatives.
- Joint ventures, strategic alliances, or contractual negotiations.
- Regulated collaborations that benefit both parties and comply with U.S. securities law and anti-corruption standards.

**All such meetings must be pre-approved and documented, including:**

- Purpose and agenda.
- Participants and roles.
- Compliance oversight.

### 6.1. Legal, Regulatory, or Compliance Matters

Meetings may be required to address:

- Investigations by regulators (e.g., **SEC, FINRA, state regulators**).
- Compliance reviews, audits, or enforcement inquiries.
- Litigation or formal dispute resolution processes.
- Institutional investors.
- Regulated business partners.
- Regulated Financial Institutions.
- Authorized Strategic Business Partners.
- Licensed Market Participants.
- Governmental or Quasi-Governmental Financial Entities.

**These meetings are permitted with documented justification and compliance oversight**

## 7. Consequences of Non-Compliance

### 7.1. For Employees and Representatives

Violation of this policy may result in:

- Disciplinary action, including termination.
- Reporting to regulatory bodies where applicable.
- Disqualification from investor-facing roles.

### 7.2. For Investors

Investors participating in prohibited meetings may:

- Have access privileges restricted.
- Be subject to review under Optima Asset investor conduct policies.
- Be transitioned to alternative communication protocols.

### 7.3. Legal Implications

Unauthorized meetings may expose the firm and individuals to:

- Regulatory enforcement actions under U.S. securities law.
- Legal liability or reputational harm.
- Compliance investigations by **FINRA** or the **SEC**.

## 8. Video Meetings Policy

### Prohibition of Video-Based Meetings

In addition to in-person meetings, video meetings (including but not limited to Zoom, Teams, Google Meet, WhatsApp Video, or any third-party video conferencing platforms) between investors and account managers or any Optima Asset service providers are strictly prohibited, unless explicitly approved under the limited exceptions outlined in this policy.

## 9. Security and Compliance Rationale

As a financial services firm operating under U.S. regulatory expectations, Optima Asset maintains strict controls over investor communications. Video meetings are prohibited due to the following critical risks:

**1.Data Security and Confidentiality Risks**
Video conferencing platforms may be subject to:

- Unauthorized recording or screen capture.
- Data interception, storage outside U.S. jurisdictions, or third-party access.
- Breaches that could expose sensitive financial, personal, or transactional information.

Such risks conflict with the firm's obligations under U.S. data protection, cybersecurity, and record-keeping standards applicable to financial institutions.

**2. Regulatory Supervision and Recordkeeping Limitations**
U.S. securities regulations (**including SEC and FINRA supervisory principles**) require firms to:

- Maintain accurate records of investor communications.
- Supervise investment-related discussions.
- Prevent dissemination of misleading or non-approved statements.

Video meetings present challenges in ensuring complete supervision, standardized disclosures, and reliable archival in accordance with regulatory record-retention requirements.

**3. Risk of Misrepresentation or Unauthorized Advice**
Video interactions increase the risk of:

- Informal or unscripted statements being interpreted as investment advice.
- Visual cues or demonstrations that may be misconstrued as guarantees, inducements, or personalized recommendations.
- Inconsistent messaging across investors, potentially violating fair disclosure standards.

## 10. Permitted Alternatives

To ensure security, compliance, and investor protection, Optima Asset authorizes communication exclusively through:

- Recorded and monitored telephone calls.
- Official company email systems.
- Secure, company-approved messaging platforms.
- Written correspondence retained in compliance with recordkeeping requirements.

**These channels provide a controlled environment that aligns with U.S. regulatory expectations and internal compliance standards.**

## 11. Exceptions

Video or physical meetings may only be approved under the Permissible Exceptions section of this policy, including:

- Institutional investors.
- Regulated business partners.
- Regulated Financial Institutions.
- Authorized Strategic Business Partners.
- Licensed Market Participants.
- Governmental or Quasi-Governmental Financial Entities.

All such meetings require prior written approval, compliance supervision, and documented justification.

## 12. Consequences of Violation

Any attempt to conduct or solicit prohibited video or personal meetings will be considered a serious compliance breach and may result in:

- Immediate termination of the meeting.
- Internal investigation.
- Disciplinary action or account restrictions.
- Potential regulatory reporting under applicable U.S. law.

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