TRIBECA
FINANCIAL, LLC
REGISTERED INVESTMENT ADVISORS

INVESTMENT POLICY STATEMENT

What Is an Investment Policy Statement?

An investment policy statement (IPS) describes the investment philosophy, defines the investment management procedures, and identifies the investor's long-term goals and risk tolerance. The development of an IPS follows the basic approach underlying investment planning: assessing your financial condition, setting goals, developing a strategy toward your goals, implementing the strategy, regularly reviewing the results and adjusting the strategy or implementation as circumstances dictate. An IPS assists and encourages you to be more disciplined in your investment approach. The formal requirement for written investment policies originally arose out of regulations such as the Employee Retirement Income Security Act (ERISA), relating to company retirement plans.

With the enactment of ERISA in 1974, trust fiduciaries became liable for breaches in prudence and diversification standards. ERISA 402(b)(1) states, "Every employee benefit trust shall provide a procedure for establishing and carrying out a funding policy and method consistent with the objectives of the trust and requirements of this title." In most states "The Uniform Prudent Investor Act" has created a further need for those acting in a trustee or fiduciary role to clarify the process by which all investment decisions will be made. The law makes it clear that following a prudent process is the key criteria for judging whether or not trustees were acting prudently, not whether the investments make or lose money.

Steps to Take to Establish an Investment Policy

1. Assess your financial situation – identify your goals and needs
2. Determine your risk tolerance and time horizon
3. Set investment objectives
4. Identify restrictions on the portfolio and its assets
5. Determine an asset allocation based on risk tolerance and goals
6. Determine methodology regarding rebalancing, portfolio reviews, and reporting, etc.
7. Invest and manage the portfolio

INTRODUCTION

The purpose of this Investment Policy Statement (IPS) is to establish an understanding between ____(“Client”), Tribeca Financial, LLC (“Investment Manager”), and _____________________________________(“Financial Advisor”) as to the investment goals and objectives, and management policies applicable to the Client’s investment portfolio (the Portfolio). This Investment Policy Statement will:

- Establish reasonable expectations, objectives and guidelines in the investment of the Portfolio.
- Create the framework for a diversified asset allocation in accordance with client’s risk tolerance and goals, including:
  - Specifying the target asset allocation for the portfolio;
  - Establishing investment guidelines regarding the selection of permissible securities and diversification of assets; and
  - Describing a risk posture for investment of Client’s portfolio
- Define the responsibilities of Client, Financial Advisor, and the Investment Manager.
- Encourage communication between Financial Advisor, Client, and The Investment Manager.

This IPS is not a contract. It is a summary of the investment philosophy and procedures guiding the Client, Investment Manager and Financial Advisor. The investment policies described in this IPS are considered dynamic and shall be updated as necessary to reflect Client’s status and philosophy regarding investment of the Portfolio.

It is understood there can be no guarantee about the attainment of the goals or investment objectives outlined herein.

INVESTMENT OBJECTIVES

The objectives for these assets shall be to provide exposure to a diversified mix of global asset classes. No guarantees can be given about future performance, and this Investment Policy Statement shall not be construed as offering such a guarantee.

TIME HORIZON

For the purposes of planning, the time horizon for these investments is to be at least five years. Clients should realize that the possibility of capital loss does exist. should have a time horizon of at least 10 years.

TAX CONSIDERATIONS

The recommended portfolios follow a strategy designed to avoid active trading, and thus are inherently tax-efficient. For non-retirement accounts (non-qualified funds) you and your advisor can choose a tax-managed portfolio which may include additional tax management strategies at the asset class level. Other strategies may include deferring realization of net capital gains, attempting to minimize the receipt of dividend income in order to minimize taxable distributions, and harvesting short and long-term losses. The fixed income portion of the portfolios may utilize short-term municipal bonds to provide income exempt from federal personal income taxes.

RISK TOLERANCE

Investment theory and historical capital market return data suggest that, over long periods of time, there is a relationship between the level of risk assumed and the level of return. In general, higher priced risk (e.g. volatility of return) is associated with higher return over the long term. For example, an aggressive portfolio (80% equity, 20% fixed income) may have a high expected return but may experience a loss of 15% or more in one year. In contrast, a conservative portfolio (20% equity, 80% fixed income) over the same time period may have a lower expected return but may experience a loss of only 3% or more in a given year. Portfolios with a majority of equities are expected to have significant year to year volatility, so it is important that holders of such portfolios have a long-term investment horizon.

Client, along with Financial Advisor, recognizes that higher expected returns involve higher volatility and has indicated an understanding of this concept. Client has indicated a willingness to tolerate declines in the value of the portfolio which may vary based on the model chosen and other factors.

ASSET ALLOCATION

Academic studies demonstrate that asset allocation among various asset classes far outweighs the effect of individual security selection and other methods of portfolio selection. The asset classes and allocation selected for Client’s Portfolio were selected after reviewing the long-term performance, associated risks and rewards, and Client’s risk tolerance and objectives. Investment Manager retains the right within its discretionary authority to strategically alter the asset allocation from time to time, as deemed necessary with the exception of the target equity to fixed income ratio which will remain the same. Portfolios can and do typically include a 1-2% cash position.

Updated Allocations

From time to time, it may be desirable to amend the basic asset allocation policy or other calculations. When such changes are made, updates will be maintained in Client’s file as an Appendix and will be considered part of this Investment Policy Statement.

Rebalancing Procedures

From time to time, market conditions will cause the Portfolio's investment in various asset classes to vary from the established allocation. To remain consistent with the asset allocation guidelines established by this Investment Policy Statement, Investment Manager shall periodically review the Portfolio. Most portfolios do not need rebalancing more than annually. During rebalancing, positions outside of their tolerance ranges shall be rebalanced back to the recommended weighting by the Investment Manager, which may involve a combination of buying and selling mutual funds in the Portfolio. Investment Manager may allow for some deviation from the stated policy (depending on the size of the position) based upon level of deviation of the asset class and other factors.

DIVERSIFICATION

Investment of Client's funds shall be limited to individual marketable securities or packaged products (for example, mutual funds or unit investment trusts) in the following categories, unless agree to otherwise in writing.

Permitted Asset Class

1. Cash and cash equivalents
2. Fixed Income-Domestic Bonds
3. Fixed Income-Non-U.S. Bonds
4. Equities-U.S.
5. Equities-Non-U.S.
6. Equities-REITS (U.S. and Non-U.S.)

Prohibited Asset Classes and/or Security Types

1. Precious metals
2. Venture capital
3. Short sales
4. Purchase of letter stock, private placements, or direct payments
5. Leveraged transactions
6. Commodities transactions
7. Puts, calls, straddles, or other option strategies
8. Purchases of real estate, with the exception of REITS

INVESTMENT MONITORING AND CONTROL PROCEDURES

Meetings and Communication between Client and Financial Advisor

As a matter of course, Financial Advisor shall keep Client apprised of any material changes in Investment Manager's recommended investment policy, procedures, and operations. In addition, Financial Advisor shall meet with Client no less than annually to review and explain the Portfolio's investment results and any related issues. Financial Advisor shall also be available on a reasonable basis for telephone communication when needed.

DUTIES AND RESPONSIBILITIES

The Financial Advisor

The Financial Advisor's role is to review your overall financial situation, risk tolerance and objectives to select the portfolio model. The asset allocation decision may be the single most important decision you and your financial advisor will make. Discipline is critical to this decision.

The Investment Manager

The Investment Manager is expected to manage the Portfolio in a manner consistent with this IPS and in accordance with State and Federal law and the Uniform Prudent Investor Act. Investment Manager is a Registered Investment Advisor and shall act as the investment advisor to Client until Client decides otherwise.

The Client

Client shall be responsible for providing Financial Advisor with all relevant information on his/her financial conditions and risk tolerances and notifying Financial Advisor promptly of any changes to this information.

ADOPTION

Portfolio Selection

Based on risk tolerance, I/We select the following asset allocation:

1. Please initial the box(s) that correspond(s) with your selection*.
2. For accounts $100,000 or greater, you may select one option from column #1 and one option from column #2; OR you may select one option from the global portfolios.
3. Accounts $100,000 and under are strongly encouraged to select one of the global portfolio options.

1 ← **AND** → **2**

1		2	
☐	**Global Equity Aggressive** 100% Equity/0% Fixed Income	☐	**Standard Account** (Tax-Aware Portfolio)
☐	**Equity Aggressive** 100% Equity/0% Fixed Income	☐	**Tax-Deferred Account**
☐	**Aggressive** 80% Equity/20% Fixed Income	☐	**Environmentally Sustainable Account**
☐	**Balanced** 60% Equity/40% Fixed Income		
☐	**Moderate** 40% Equity/60% Fixed Income		
☐	**Conservative** 20% Equity/80% Fixed Income		
☐	**Income** 0% Equity/100% Fixed Income		

OR**

Global 25%/75% Portfolio	Global 60%/40% Portfolio	Global 100% Equity Portfolio
☐	☐	☐

**Strongly encouraged for accounts $100,000 and under

*Please be advised that Tribeca will invest all non-qualified accounts in the tax-managed version of the models unless Financial Advisor or Client specifically instructs Tribeca to use another model.

The initial(s) below affirms that the portfolio selection I/we have indicated herein is understood and accepted.

Client Initials: ____________________________ Financial Advisor Initials: ____________________________

Client Initials: ____________________________ Financial Advisor Initials: ____________________________

Adopted by the below signed:

I/We hereby acknowledge that I/We have read and understand the Investment Policy Statement which outlines and prescribes the investment philosophy and procedures based on my/our objectives. I/We have effectively communicated our financial circumstances and investment objectives. I/We fully understand the risk parameters associated with the investment philosophy and the portfolio recommended to me/us. I/We acknowledge that my/our account(s) will be managed in accordance with these parameters unless I/We have imposed reasonable restriction on the account, in writing. By signing this adoption agreement, I/We acknowledge acceptance and agree with the information contained in the Investment Policy Statement.

Client 1/Trustee 1		**Client 2/Trustee 2**	
Signature:	______________	Signature:	______________
Print Name:	______________	Print Name:	______________
Date:	______________	Date:	______________
Client 3/Trustee 3		**Client 4/Trustee 4**	
Signature:	______________	Signature:	______________
Print Name:	______________	Print Name:	______________
Date:	______________	Date:	______________
Advisor			
Signature:	______________		
Print Name:	______________		
Date:	______________		