

Text Messaging Policy

Background

In addition to telephone, mail, and email, NAMCOA advisors may now communicate with Client or prospects by Texting.

Texting is commonplace for most of us these days, but less so in the financial industry because of the technology compliance issues involved.

However, at NAMCOA we have found a compliant method of texting to clients, as it is vital to connecting, especially in volatile environments. So, to enable text messaging to our clients compliantly and without sacrificing privacy, we partnered with [MyRepChat](#).

Your IAR (Investment Advisor Representative) will communicate with you what their Text number is, for basic "Text" type communications. ***Please note that trading instructions may never be texted, as they cannot be left on voice mails or placed in email communication either. Those instructions must be directly communicated to your Advisor.***

Guiding Principles

- Preserve texting as an additional channel for critical client communications as outlined in this policy.
- Keep texts to a minimum to ensure that Clients remain in the texting program and do not opt-out because of overuse.

Categories of Messages

Texting is reserved for information which is considered critical and/or time sensitive. The following are the categories of mass text messages permitted under this policy:

- Crisis and/or emergency, or significant disruptions to Company operations, including activities which pose a threat to public safety, Client documents and/or other client related communications.
- Information critical to Client objectives and/or financial consulting notifications.
- Other critical messages as determined by the Investment Advisor.

NAMCOA Text messages are not used for:

- General information to large populations.
- Repeat reminders of text messages already circulated.
- Personal matters (e.g. items for sale)
- Political or Social Type Issue comments.

Text messaging is not designed to be the sole means of communicating an essential message or announcement. The text message may be supplemented by some other means of communication (e.g. electronic, paper notice) to ensure Clients receive intended or requested information.

Client Opt-Out Feature

- Clients are prompted at any time to enter STOP if they wish to cease future Text messaging from an Advisor.

Mass Text Approvals

- Prior to being sent, mass text messages (over 25 persons) need to be approved by the Chief Compliance Officer.

NAMCOA Advisors using text messaging must ensure the text message is:

- Valid and in compliance with the Text Messaging Policy
- The wording is appropriate
- The circulation list is correct

Should you have any questions on our Text Messaging Policy, please contact the firm's Chief Compliance Officer, Paul McIntyre at pmcintyre@namcoa.com.

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