



ACCESS PERSON CERTIFICATIONS 2024



I, _____, certify the following:

COMPLIANCE POLICIES AND PROCEDURES MANUAL

I have reviewed Adasina Social Capital's current Compliance Policies and Procedures Manual and acknowledge the following:

I understand all policies and procedures as stated, and I agree to abide by all provisions of such policies and procedures.

ACCESS PERSON TRADING

I have read Adasina Social Capital's *Access Person Trading* policies and procedures and acknowledge the following:

I agree to abide by all provisions of the policies and procedures, and I will submit to the Chief Compliance Officer my own accounts and the names (and accounts) of members of my household who are subject to the policies.

I understand that the policy and procedures cover the discretionary trading activities of all employees of Adasina Social Capital and their Household Members. The policy and procedures cover any securities transaction in which such person may have a direct or indirect beneficial interest. Persons are deemed to have a beneficial interest in a security if they: a) have voting or discretionary power with respect to the security AND b) have a direct or indirect financial interest in the security. Employees are required to report all trading accounts over which they maintain discretion but are not required to report trading accounts over which they do not make investment decisions.

For the purposes of this certification, securities include, but are not limited to, any notes, stocks, ETF shares, and bonds. Please refer to *Appendix 1* to this Certification for a defined list of in-scope securities. **If you are unsure if you are required to report an investment, please contact the Compliance Team for confirmation.**

CODE OF ETHICS

I have read Adasina Social Capital's *Code of Ethics* contained in the *Compliance Policies And Procedures Manual* and acknowledge the following:



1. I understand the policies and procedures as stated, including those related to insider trading, outside business activities, conflicts of interest, political contributions, gifts and entertainment; and
2. I agree to abide by all provisions of the *Code of Ethics*.

I understand that under the *Code of Ethics*, I am prohibited from purchasing or selling securities on the basis of material non-public information. I further understand that under the *Code of Ethics*, I am prohibited from disclosing material nonpublic information.

Conflict of Interest

I understand that under the *Code of Ethics* policies and procedures, I am required to avoid any outside activities, interests or relationships that either directly or indirectly conflict with or create the appearance of the existence of a conflict of interest with my ability to act in the best interests of the Firm and its clients. I understand that if a conflict or the appearance of a conflict between my interests and the interests of the Firm or its clients arises, the interests of the Firm and its clients will prevail. I agree that the determination as to the existence or appearance of a conflict of interest will be made by the Firm in its sole discretion.

Outside Business Activity

I understand that under the policies and procedures, I am required to avoid any outside activities, interests, or relationships that either directly or indirectly conflict with or create the appearance of the existence of a conflict of interest with my ability to act in the best interests of the Firm and its clients. The Firm's code of ethics precludes me from accepting employment or compensation from any other person as a result of any business activity other than a passive investment outside the scope of my relationship with the Firm unless I have provided prior notice to the Firm and received authorization from the Chief Compliance Officer.

Social Media Accounts

I have read Adasina Social Capital's policies and procedures related to advertising, marketing, and the use of social media and acknowledge the following:

I understand the policies and procedures as stated, and I agree to abide by all provisions of the Policies and Procedures and the Plan.

FIDUCIARY DUTY

I understand that the Firm and its employees are subject to principles of fiduciary duty which are enforceable under both federal and state law. These principles dictate that the Firm provides its services in a manner that serves the best interests of each client and places the interests of its clients ahead of those of the Firm and its employees. I understand my obligation as a fiduciary under applicable law.

Safeguarding Private Client Information And Cybersecurity Plan

I have read Adasina Social Capital's policies and procedures related to safeguarding client private information and the Firm's Cybersecurity Plan and acknowledge the following:

I understand the Policies and Procedures and Plan as stated, and I agree to abide by all provisions of the Policies and Procedures and the Plan.

Duty To Report Violations Of Securities Regulations And Compliance Manual (Whistleblower)

I understand that as an Adasina Social Capital employee (or affiliated person) I am obligated to and agree to immediately report to the Chief Compliance Officer any violations of the federal or state securities laws and



regulations of Adasina Social Capital's compliance policies and procedures manual that are known to me to have occurred or are reasonably believed by me to have occurred.

Regulatory Investigation, Criminal Charges, Disciplinary Events, Litigation

I understand that every Firm staff member (or affiliated person) that becomes the subject of a regulatory investigation, disciplinary enforcement action, or litigation, is served with a subpoena, becomes subject to any judgment, order, or arrest, or is contacted by any regulatory authority must immediately inform the Chief Compliance Officer of such.

Confidentiality

I agree that all information related to Adasina Social Capital that I acquire during my employment or affiliation with Adasina Social Capital is proprietary to the Firm or confidential to the client or employee to whom it relates, and I agree to keep all such information confidential both for the duration of my employment or affiliation with Adasina Social Capital and thereafter.

EMPLOYEE DISCLOSURES

1. Have you bought or sold any Securities in discretionary personal trading accounts during the quarter referenced by this form? (This does not include accounts in which you do not personally perform or specifically direct or instruct trading).
☐ YES
☐ NO
2. Do you have any Securities or discretionary accounts not managed by Adasina? (This does not include accounts in which you do not personally perform or specifically direct or instruct trading).
☐ YES
☐ NO
3. Do you have any Securities not held by a qualified custodian and, therefore, not reported in the monthly statements you provide? (For example, physical bonds or stock certificates.)
☐ YES
☐ NO
4. Do you have any new household members who have fallen under the firm's policies since the last certification? (Generally, relatives by blood or marriage living in the same household as you and who maintain their own or joint discretionary accounts. This does not include accounts in which the Household Member does not personally perform or specifically direct or instruct trading.)
☐ YES
☐ NO
5. If YES, please provide the household or family member's name.

Family/Household Member Name:



6. Do your Household Member(s) have any Securities not held by a qualified custodian and, therefore, not reported in the monthly statements you provide? (For example, physical bonds or stock certificates.)

☐ YES

☐ NO

☐ N/A

7. Have your Household Member(s) bought or sold any Securities during the quarter referenced by this form? (This does not include accounts in which you do not personally perform or specifically direct or instruct trading).

☐ YES

☐ NO

☐ N/A

8. Have you had any changes to your outside business activities since the last certification?

☐ YES

☐ NO

I currently have new or unreported outside business activities listed below:

9. Have you had any changes to your social media accounts since the last certification?

☐ YES

☐ NO

I currently have new or unreported social media sites and accounts that I maintain in which I reference my professional credentials, work experience, employment, or the Firm:

Social Media or Blog Service

User Identity

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10. Have you been convicted of any felony or misdemeanor that hasn't been reported to your employer?

☐ YES

☐ NO

11. I understand In order to avoid an event in which a Client and an Adasina Access Person trade in the same security on the same day, Adasina's Access Persons and their Household Members are restricted from trading entirely during the Blackout Period. The Compliance Team will send the annual Black Out dates to the Adasina team each January.

If an Access Person or their Household Members desire to trade any security during the Firm's Blackout Periods, pre-approval for the trade is required. (Each January, your Compliance Team will communicate the annual Blackout Dates for each year. If you need those dates resent to you, please reach out to Compliance.)

☐ YES

☐ NO

ACKNOWLEDGEMENT OF ALL CERTIFICATIONS

I acknowledge and agree to the policies stated and referenced herein, and I understand my obligations thereunder. I confirm that, to the best of my knowledge, the information I have provided herein is true, accurate, and complete.

Name: _____

Signature: _____

Date: _____



ACCESS PERSON CERTIFICATIONS

Appendix 1



DEFINITIONS

“Access Person” means, regardless of Firm employment status (full-time, part-time, temporary, independent contractor, W-2 or 1099), all persons who have access to non-public client information and information regarding client securities transactions, persons who are involved in making securities recommendations to clients or have access to client recommendations and/or who are owners or control persons of the advisor.

“Beneficial Interest” means any direct or indirect ownership, future ownership, control, or authority interest in an investment account or security, including beneficiary, heir, trustee, executor, investment advisor, or other status over trust accounts, estate assets, custodial accounts or other accounts in which the employee has an interest or exercises authority or investment discretion. For purposes of these policies, the term is considered to include securities held by members of an Access Person’s Household Members; provided, however, this presumption may be rebutted.

“Household Member” means an Access Person’s spouse, domestic partner, children, parents, siblings, other relatives, and any other member of the person’s immediate household, a trust or estate in which any member of his or her immediate household has a beneficial interest or over which the immediate household member has control. Household members include adopted and foster children, stepchildren, grandchildren, parents, stepparents, grandparents, siblings, and in-laws.

“Security” means any note, stock, treasury stock, security future, bond, debenture, evidence of indebtedness, certificate of interest or participation in any profit-sharing agreement, collateral-trust certificate, preorganization certificate or subscription, transferable share, investment contract, voting-trust certificate, certificate of deposit for a security, fractional undivided interest in oil, gas, or other mineral rights, any put, call, straddle, option, or privilege on any security (including a certificate of deposit) or on any group or index of securities (including any interest therein or based on the value thereof), or any put, call, straddle, option, or privilege entered into on a national securities exchange relating to foreign currency, or, in general, any interest or instrument commonly known as a “security”, or any certificate of interest or participation in, temporary or interim certificate for, receipt for, guaranty of, or warrant or right to subscribe to or purchase any of the foregoing.