COMMUNICATIONS WITH THE PUBLIC
ELECTRONIC COMMUNICATIONS

I. ELECTRONIC COMMUNICATIONS REVIEW POLICY

Registered representatives are required to use either a currently owned domain email address that sends electronic communication through our vendor or sign up for a @kcdfinancial.com email account to communicate with the home office, the public or vendors regarding securities related matters, requiring these steps to be taken:

1. KCD Financial, Inc. will contact you after the registration process is complete to discuss the email policy, procedure, and sign-up process.

2. KCD Financial, Inc. will establish your email account on our hosted site for email review and retention.

3. The signature line of your emails must contain the KCD disclosure line applicable to your situation. (See Communication with the Public- Disclosure & Review for your proper disclosure).

II. SECURITIES SENSITIVE ELECTRONIC MATERIALS

Correspondence: All incoming or outgoing email messages must be archived for KCD to review, therefore only the KCD or pre-approved other domains that allow archiving can be used to communicate with clients. Per KCD's WSP, Electronic communications to be sent to 10 or more people in a 30-day window must be pre-approved and will need to be recorded on your communication blotter.

Advertising: Materials published in electronic media with public access (websites) need to be pre-approved.

Sales Literature: Materials made available to the public that contain sensitive information, such as documents attached to emails, the attachments must be password protected.

III. ARCHIVING PROCEDURES

Electronic Correspondence must be archived and reviewed by KCD through our outside vendor. You do not have to wait for approval to send a general securities related email to individual clients. KCD will conduct the review and retain these records. Likewise, when you are responding to an incoming securities related client email, it will also be reviewed and archived through outside vendor.

Electronic Correspondence with attachments that qualify as sales literature or advertising can only be sent after the attachments have been individually reviewed and approved.

IV. NON-ALLOWABLE FORMS OF ELECTRONIC COMMUNICATION

INSTANT MESSAGING, CHAT ROOMS, and BLOGS regarding securities or investment matters are **non-allowable** forms of communication for registered reps of KCD. **(TEXT MESSAGING** is allowed with a KCD text phone number that is archived and with additional training.) (**LinkedIn** is also allowed **only** if Rep agrees to have it archived.)

V. DISCOVERY OF NON-COMPLIANCE Any violation of these guidelines discovered during a review will result in disciplinary actions including heightened supervision, more stringent review procedures, fines, and termination if the situation warrants such action. Excluding emails, all other items of Communications with Public materials are ***submitted and approved prior*** to use.

VI. RECORDS RETENTION REQUIREMENTS

Representatives are required to keep records of communications and attachments sent via social media, they can be retained via hard copy, maintaining them on your computer, or backing up copies on non-alterable, non-deleting storage media such as a non-rewritable CD-ROM. Records must be available for review upon request by KCD or other securities examiners.