

GA PINCUS FUNDS

GA PINCUS FUNDS, LLC

SOCIAL MEDIA POLICY & PROCEDURES

Adopted: 2026

1. Regulatory Authority

This policy is adopted pursuant to the Tennessee Securities Act of 1980 and applicable rules governing state-registered investment advisers.

GA Pincus Funds, LLC ("Adviser") is registered with the State of Tennessee and is subject to state advertising, anti-fraud, and recordkeeping requirements.

All social media communications constitute advertising under Tennessee regulations when used to promote advisory services.

2. Scope of Policy

This policy applies to all social media activity conducted for business purposes.

Social media includes LinkedIn and any other internet-based communication platform used to promote advisory services.

As a single-member firm, only Gabriel Pincus is authorized to post business-related content.

3. Advertising Standards (Tennessee Anti-Fraud Standard)

All communications must be true, accurate, and not misleading.

No communication may omit material facts necessary to prevent a statement from being misleading.

No promissory, exaggerated, or unwarranted statements are permitted.

Statements implying guaranteed results or risk-free investing are strictly prohibited.

4. Prohibited Practices

The Adviser shall not publish testimonials or endorsements.

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The Adviser shall not post specific securities recommendations.

The Adviser shall not provide individualized investment advice through social media.

The Adviser shall not adopt third-party content that could be interpreted as a testimonial.

Cherry-picked performance presentations are prohibited.

5. Performance Advertising

Performance information may only be published if it is accurate, fully supported by documentation, and presented in a fair and balanced manner.

Performance must clearly state the time period presented and whether returns are gross or net of fees.

Past performance must be accompanied by appropriate disclosures that past results do not guarantee future results.

Performance discussions are prohibited within interactive comment threads.

6. Pre-Approval Requirement

All static social media content must be reviewed and approved by the Chief Compliance Officer (CCO) prior to publication.

Any material modification to previously approved content must be re-approved.

The CCO shall maintain documentation evidencing review and approval.

7. Interactive Content Controls

Interactive communications must remain educational and general in nature.

No client-specific advice or portfolio discussions are permitted.

Any comment suggesting dissatisfaction or alleging wrongdoing shall be treated as a complaint under the Adviser's Complaint Policy.

8. Recordkeeping Requirements

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The Adviser shall maintain copies of all social media content, including posts and material comments, for not less than six (6) years.

Records must be readily accessible for state regulatory examination.

Supporting documentation for performance claims must be retained.

9. Monitoring

The CCO shall review social media activity at least monthly.

Interactive activity shall be reviewed at least weekly.

Any non-compliant content shall be removed promptly and documented.

10. Personal Social Media

Personal social media accounts may not be used to promote advisory services.

Employment with GA Pincus Funds may be listed on personal profiles, but no advisory content may be posted.

11. Annual Certification

The Adviser shall certify annually that social media practices comply with Tennessee regulations and this policy.