



Electronic Communications Policy

September 2025

FINRA Rule 3110(b)(4), 3110.07, 3110.08 and 3110.09

This policy governs the use of electronic communications by employees of Realta Equities Inc., ("Realta" or the "Firm") (including part-time employees, interns, vendors, and independent contractors). It applies during business hours and after-business hours. All electronic business communications must be accessed and transmitted only through Realta sponsored systems. All employees (full and part-time, interns, vendors, and independent contractors) are required to certify on an annual basis that they are familiar with and in compliance with the policy.

1. Firm electronic systems or communications devices are for Firm business purposes and business communications must conform to accepted business standards and regulatory requirements.

- Inappropriate communications (profanity, obscenity, threats, and otherwise offensive content) are prohibited. Report threatening or harassing communications to Compliance.
- Communications must include current and valid information.
- Communications that must be accompanied by a prospectus may not be sent electronically unless the prospectus is available as an electronic attachment,
- Copyrighted material cannot be sent unless authorized, contact Compliance for assistance.
- Copyrighted software cannot be copied or transmitted to others unless authorized.
- Reference and/or links to web sites are a form of communication requiring Compliance approval prior to use.
- Employees are prohibited from sponsoring a social media site or using a communication device that includes technology which automatically erases or deletes content.

2. Electronic business communications must be accessed and transmitted only through Firm sponsored systems.

- Regulators require retention of business communications and Firm systems designed to comply with retention requirements.
- Approved Firm sponsored systems include email, e-faxes and *Microsoft Teams Chat* that is connected to the Firm's communications network (the use of personal e-mail and text messaging for business communications is prohibited).
- Personal smartphones only when it is appropriately synchronized using Microsoft's Outlook to the Firm's communications network.
- Home computers or other personal devices and external systems may not be used for business purposes unless such electronic communication is sent through a Firm e-mail address that is connected to the Firm's communication network.
- Encryption of information may be required by the Firm. Employees may not independently encrypt communication on the Firm's network.

3. Consider electronic communications as public communications; protect confidential information.

- Electronic communications is subject to review and retention and may be the subject of subpoena in a civil or regulatory action.
- Confidential communications must not be sent on portable devices in public areas unless encrypted.
- Do not view confidential communication where unauthorized persons may have access to (i.e., elevators, air travel, other public places).
- Safeguard portable devices to avoid unauthorized access to Firm business.
- Safeguard passwords.
- Close open pages and sign out when the devices not in use.

4. Restrictions on unsolicited e-mails under the CAN-SPAM Act of 2003.

- Unsolicited “mass” commercial e-mails are prohibited.
- “Commercial” e-mail includes any electronic messages that sends a commercial advertisement or promotes a commercial product or service. It does not include e-mail where there is an existing business relationship.
- Recipients may “opt-out” of receiving future e-mails. Forward such requests to compliance@realtawealth.com
- “Address harvesting” or “dictionary attacks” may not be used to obtain e-mail address from the internet.
- E-mails sent from the Firm systems will require identification of the Firm and disclosures or disclaimers.

5. Participation in social media sites, blogs, and other electronic forums or communication systems is subject to restrictions.

- Employees are prohibited from posting business-related information to the internet via social media without prior Compliance approval.
- Media and systems used must be able to provide a permanent record of communications for retention by the Firm. The Firm will monitor and review such communications. Additions or changes to the Firm’s website must receive prior approval from Compliance.
- Accessing offensive sites is prohibited. The Firm may block sites that are offensive or contrary to the conduct of business.

6. Electronic communications will be reviewed, monitored, and audited by the Firm.

- All electronic communications are subject to review and retention.
- Communications that require pre-use approval may not be transmitted prior to review by the designated supervisor. This includes similar communications to be sent to 25 or more investors within any 30 calendar-day period and make any financial or investment recommendation or otherwise promote a product or service.
- Advertising, sales literature, and market letters (Advertising Supervisor and/or Compliance approval required).
- Communication defined as Research

7. Text Messaging

- Employees are prohibited from texting clients without using a messaging archiving service.
- Realta uses Telemessaging and Celltrust to archive messages.
- Employees must contact the IT department at tech@realtawealth.com to download the required program to archive messages.

8. Failure to Comply

- Failure to comply with this policy may lead to disciplinary action. Non-compliance may generate one or more of the following:
 - Oral and/or written warning or notification
 - Education/training
 - Suspension of electronic communications privileges permanently or for a set period of time
 - Regulatory discipline
 - Suspension or termination of employment
 - Specific legal action against recipients who divulged or receive data that the firm may consider confidential

9. Consent to Policy

- Use of the Firm's electronic communications systems represents the employee's consent to the terms outlined in this Policy, including consent for the Firm to monitor and audit content and/or usage.