

## Investment Policy Statement

Client Name

Day, Month & Date, Year (&/Or MM/DD/YYYY)

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**AboveRock<sup>SM</sup> LLC**

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Prepared for:

Client Name

Address

City, State, Zip

Telephone

[E-Mail Address](#)

Prepared by:

Bharadwaj "Brad" Nippani

AboveRock LLC

PO Box 550508

Jacksonville, FL 32255

T +1 904 535 2860

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## PVS wrt SSG – Sample

<u>Client Name</u>	<u>Amount</u>
Accounts Governed, Supervised, Administered & Managed Via The <u>IPS</u>	
Pershing LLC as Custodian <u>FBO - IRA - 12Y***</u>	0.000000000001
Pershing LLC as Custodian <u>FBO - Rollover IRA - 34Y***</u>	0.000000000001
Pershing LLC (Retail, <u>NO</u> ) - <u>***123</u>	0.000000000001
<u>Total Portfolio Value (MMDDYY)</u>	<u>0.000000000003</u>
<u>Custodian</u>	<u>Phone Number</u>
Pershing LLC (Via Shareholders Service Group/ <u>SSG</u> ) - <u>https://www.netxinvestor.com</u>	800 380 7370
<u>re Access to Sites</u>	
Please note that logging into sites with incorrect/outdated information may lock the account holder from future Access until one or more verification steps, including security questions, are re-established.	

## PVS wrt SSG & Custodian 2 - Sample

<u>Client Name</u>	<u>Amount</u>
Accounts Governed, Supervised, Administered & Managed Via The <u>IPS</u>	
Custodian &/Or Account Registration, Account Number 1	\$0.01
Custodian &/Or Account Registration, Account Number 2	\$0.01
Custodian &/Or Account Registration, Account Number 3	\$0.01
<u>Total Portfolio Value (MMDDYY)</u>	<u>\$0.03</u>
<u>Custodian</u>	<u>Phone Number</u>
Pershing LLC (Via Shareholders Service Group/ <u>SSG</u> ) - <u>https://www.netxinvestor.com</u>	123 456 7890
Custodian Name, Custodian's Secure ( <u>https://</u> ) Website Address	123 456 7890
<u>re Access to Sites</u>	
Please note that logging into sites with incorrect/outdated information may lock the account holder from future access until one or more verification steps, including security questions, are re-established.	

Past performance is not guarantee of future results.

Participation in equities, variable investments and securities or bond markets involves risk including loss of some or all of your principal investment.

This material does not constitute an offer to sell or a solicitation of an offer to buy any security in any jurisdiction.

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## Adviser & Client Responsibilities

1. An Investment Policy Statement (IPS) is a summary of your present & ongoing financial status & condition, "your situation" if you will, &, among other necessary & important considerations, your requirements, goals, time horizon, investment temperature & tolerance for risk, & the general investment strategy, & governance, supervision, administration & management procedures recommended in a Fiduciary capacity by your Adviser Representative on behalf of the Adviser to be utilized in, & with respect to, your securities & advisory portfolio.
2. An Investment Policy Statement will, at times serve as a guide to your investment plan and, at other times, be guided by your overall financial scenario which perhaps includes assets beyond the scope of this document.
3. An Investment Policy Statement allows you, together with your Adviser, to govern in which securities & investments, & when, how, why, and where your money is invested based upon, among other considerations, your time horizon, investment temperature and your risk tolerance as noted above, & the methodology to be utilized with respect to an investment (and/or a manager) selection, permissible securities, scope and the extent of diversification of assets, including, but not limited to, specifying the criteria for evaluating the performance of the portfolio's assets, & rebalancing, buy-sell disciplines, portfolio reviews & performance reporting, as applicable.
4. An Investment Policy Statement, designed to be flexible, must adjust over time in response to your financial goals and investments, & to an ever-changing, dynamic domestic, foreign, international and/or global capital market, economic and geo-political environments.
5. The principal reason for an Investment Policy Statement is to enable you & the Adviser to protect your portfolio from ad-hoc revisions of a sound long-term policy. In the absence of an Investment Policy Statement, and especially during times of market turmoil and/or volatility, economic and/or geo-political upheaval, Investors are more inclined to making, or asking for, impromptu investment decisions, misguided investments, securities & strategies, and/or implementations which are inconsistent with prudent governance & investment management principles.
6. An Investment Policy Statement is intended to provide you & the Adviser with a well thought-out framework upon which awareness regarding investment decisions governed in strength & soundness are understood, & explained to you to then be built, supervised, administered & managed, including determining the asset classes & their proportions appropriate for maximizing the likelihood of achieving your investment objectives at the lowest possible level of risk.
7. An Investment Policy Statement defines the duties and responsibilities with respect to you, the Investor, and with respect to the Adviser, a Fiduciary, including encouraging, fostering & facilitating wise, mature, respectful, responsible, responsive, & simple, clear, straight-forward communication which is effective between all parties whose names & signatures are on this document.

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## 8. Duties & Responsibilities:

### a). The Adviser & The Custodian:

- i. The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of AboveRock LLC shall govern, supervise, administer & manage the portfolio in a manner consistent with this Investment Policy Statement and in accordance with applicable federal, state or local bureaucracies' regulations & legalities asked, sought, inquired & clarified, IN LIGHT, then understood as applicable to the Adviser's work,
- ii. AboveRock LLC is a Registered Investment Adviser and shall, therefore, act as the Investment Adviser and Fiduciary,
- iii. Adviser shall be responsible for designing and implementing an appropriate asset allocation and an investment supervision & asset management plan consistent with the investment objectives, time horizon, risk tolerance and other guidelines and constraints, as applicable, outlined in this Investment Policy Statement,
- iv. Adviser shall recommend an appropriate Custodian(s) for Investor assets,
- v. Adviser shall provide detailed explanations and bring to understanding the selection of, and allocation in, the various asset classes, investment styles & categories to the Investor,
- vi. Adviser shall ensure that the Custodian provides a current prospectus & investment-related documents, when applicable, alongside statements and confirmations of activity in the portfolio, to the Investor,
- vii. Adviser shall monitor performance of all assets managed via the Investment Policy Statement,
- viii. Adviser shall recommend changes, material and otherwise when applicable to the Investment Policy Statement promptly to the Investor,
- ix. Adviser shall periodically review the suitability of investments in the portfolio with the Investor, no less frequently than quarterly,
- x. Adviser shall be available to meet with the Investor in person or via an online meeting, as applicable and feasible, at least once a year for a full review of their investment plan including, & beginning with, ""The Financial Process" document, and the Investment Policy Statement. This meeting shall be titled, termed &/or called an 'Annual Review (AR)' or an 'Annual Relationship Meeting (ARM)', &
- xi. The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding Firm matters and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents on behalf of the Adviser shall bring forth, & affirm VALUE including, but not limited to, TRUST with the Investor in accordance with 7) above on a continuous basis by ensuring that the Investor is aware of Adviser's availability & accessibility for an in-person meeting, & via the phone, e-mail, text &, if available, fax, & via online meeting modules, thus reinforcing the meaning & purpose regarding a Fiduciary with clarity, context, basis & openness in communication, conversation, and dialogue, the Firm's architecture.

### b). Discretion & Title:

- i. Investor does grant the Adviser Discretionary Authority as outlined & evidenced in the Discretionary Investment Advisory & Asset Management Agreement (LPOA), &
- ii. The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of the Adviser & together with the Custodian(s) ensures that

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Client account registrations & registration types are appropriately titled & remain in the names(s) of the Investor(s).

## c). The Client, Also The Investor:

- i. The Client shall ask, inquire, seek clarity, shall be responsible & responsive together with Adviser with respect to matters regarding the portfolio,
- ii. The Client reserves the right to request Adviser regarding changes to this Investment Policy Statement, yet shall be sensible, prudent, responsible, reasonable & responsive in explaining the reason(s) for changes to this document,
- iii. The Client shall provide Adviser with timely & relevant information on Client's present & ongoing financial status & condition and shall promptly notify Adviser of any changes in Client's life which, directly or indirectly, have a bearing on Client's financial picture including, but not limited to, the Accounts governed, supervised, administered & managed via this Investment Policy Statement,
- iv. The Client shall read and understand the investment's prospectus, offering documents & any other investment-related information, and shall read & understand the account establishment documents by the Adviser & the Custodian at the beginning of the relationship and on a continuous basis. When unclear, Client shall promptly ask Adviser &/or the Custodian or the appropriate financial institution, inquire & seek clarity, including, at Client's discretion, consulting a legal, tax or estate representative,
- v. The Client shall be responsible for exercising voting rights acquired as a consequence of purchase of securities in their Accounts including voting rights which are exercised via proxy.

## In The Know

1. This Investment Policy Statement informs you, the Client(s) that this document is not guaranteed to be accurate, complete or timely.
2. This Investment Policy Statement informs you, the Client(s), that there are no guarantees of achieving the goals and objectives outlined in this document.
3. This Investment Policy Statement informs you, the Client(s), that past performance, whether over or under, is not a guarantee of future over or under performance.
4. This Investment Policy Statement informs you, the Client(s), that this document has not been reviewed by legal representatives.

5 . This Investment Policy Statement informs you regarding the "Authorized Decision Maker (ADM)". The "Authorized Decision Maker" is the human being, the human person who is authorized to decide on any & all matters with respect to this Investment Policy Statement.

The "Authorized Decision Makers" with respect to the Accounts governed, supervised, administered & managed via Investment Policy Statement are:

- a). The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sessa "V. S." Nippani whose name & signature is on this document when signed & executed by him, &
- b). The Client(s), whose names & signature(s) are on this document when signed & executed by the Client(s).

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This Investment Policy Statement informs you, the Client(s), that any other "Authorized Decision Makers" shall have to be included "here", their names & signatures hand-written by one or both of the human beings, human persons on the signature page of this document, & their detailed contact information provided by you, the Client(s), in the additional notes page (page 22) of the "Financial Process" document. This Investment Policy Statement informs you, the Client(s), that all Authorized Decision Makers noted in this item & whose names & signatures appear on this document when signed & executed by such Authorized Decision Makers, must agree unanimously regarding matters pertaining to this Investment Policy Statement.

6. This Investment Policy Statement informs you, the Client(s), that factors which could impact the manner in which the Accounts governed, supervised, administered & managed via this Investment Policy Statement include, but are not limited to, family circumstances, lay-off, loss of a job, loss of pay, disability, separation or divorce, terminal illness, or passing.

7. This Investment Policy Statement informs you, the Client(s), that due to information security and confidentiality purposes, among others as applicable, designed to protect Client information while in transit in cyberspace, social security numbers (and other identifiable information) are not provided on this report, and are often omitted on other reports (except on account establishment documents and other documents which require such information on them) when they are provided to you, the Client(s) during the course of the year. Adviser recommends that Clients exercise caution, are alert & informed regarding matters including, but not limited to, intellectual property, creative, derivative, inheritance &/or succession rights & legalities, & establish strong passwords & secret security question(s) which authorize & authenticate access to their computers, devices, disks & similar hardware, equipment & software which has the Client(s)' content & information.

8. This Investment Policy Statement informs you, the Client(s), that during extremely volatile times & during times of heightened & uncertain market, economic, regulatory and/or geo-political environment, your Adviser Representative may choose allocations which are different from the target allocations and/or percentages listed in the Investor Allocation Report or the Investor Questionnaire.

9. This Investment Policy Statement informs you, the Client(s), Clients that the Accounts shall be governed, supervised, administered & managed utilizing a combination of passive, active and tactical asset allocation models & management styles, & that there is no one model or style, sector or asset class which is suited for every market, economic, interest rate and geo-political environment.

10. This Investment Policy Statement informs you, the Client(s), that a portfolio with global exposure has the potential to help minimize overall portfolio risk due to varying degrees of imperfect correlation between developed economies, developing economies and emerging economies.

11. This Investment Policy Statement informs you, the Client(s), that equities offer the potential for higher long-term investment returns & performance than cash or fixed-income investments. Equities also are increasingly volatile and therefore contribute to increasing portfolio volatility over time. Client(s), therefore, must be willing to accept increased levels of variation in results including occasional short-term rapid declines in their portfolio's value.

12. This Investment Policy Statement informs you, the Client(s), that markets go through cycles. This, inevitably, will birth periods of time where investment objectives are not met and/or when a manager of a particular mutual fund or another type of an investment fails to meet that particular investment's expected performance expectations. During such times, absent specific, unfavorable, hostile, extraordinary, &/or emergency events, circumstances & environments requiring immediate action, patience, prudence and

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good judgment will be employed by Adviser together with, and as alluded to in previous notes, a long-term perspective, when evaluating your Accounts' performance.

13. This Investment Policy Statement informs you, the Client(s), that certain investments not considered in the analysis & recommendations & consequently not implemented to be in one or more Accounts in your portfolio, may have characteristics similar or superior to those which have been analyzed, recommended & implemented to be in one or more Accounts your portfolio.

14. This Investment Policy Statement informs you, the Client(s), that there may be a slight to, at times, notable, price differential in unit prices, unit values or the number of shares of securities present in your Accounts, and therefore, your portfolio's value when reported by Adviser. This is due to some Custodians & financial institutions solving for four decimals and others for two. This difference may also be because of any living benefits, riders on your policy, or perhaps a rebalancing program, any of which could affect reported unit values, the number of shares owned at a particular point in time, or perhaps the way prices are entered/updated in a report. Adviser Representatives shall commit to making every effort to report unit prices, holdings and shares owned, accurately. Please notify your Adviser Representative of any errors you may find between account &/or portfolio values in one or more reports provided to you as you compare them to statements received from the Custodian. Upon notification, errors or discrepancies will be corrected and a new report with the correct numbers, figures &/or data will be generated for your review and records, and if applicable, for your signatures, promptly.

15. The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sessa "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

## Insurance Coverage, Other Safety Needs & Expenses

Please know that most all of the following items help delegate the risks a portfolio faces during a Client's pre and post-retirement years. This information may have already been provided by you in the "Financial Process" document. You are hereby advised to consult with the appropriate professionals in your life to ensure that these foundational coverage items, as applicable, have adequately been addressed and met.

Please also know that yearly reviews (or more frequent reviews, should life events dictate) are recommended to ensure that the below-noted coverage items, both from the stand-point of deductibles and insured amounts, not to mention exclusion periods, as applicable, are appropriate for you and are solved for any life changing events which have, or may, take place in your life.

a). Health Insurance, b). Long Term Care Insurance, c). Disability Insurance, d). Business & Liability Insurance, e). Homeowners Insurance (including, but not limited to, flood and earthquake coverage), f). Auto & Other Property Insurance, g). Estate &/or Trust Analysis & h). Life Insurance.

Please bear in mind that there could be certain item-specific expenses which may associated with the above-noted coverage items. These items are for your consideration and are for informational purposes only, and may not be all-inclusive. Their mention and/or inclusion in this report, as applicable, by

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AboveRock LLC or its Investment Adviser Representatives as part of this Investment Policy Statement does not constitute an offer to sell (to you) or a solicitation of an offer to buy (for you) any of these items, policies or coverages.

Please note that there may be other expenses (some of which are included in the lists below) which tend to increase during retirement years and certain others which tend to decrease. Some items may be included in, or omitted from, one or both lists below as deemed appropriate for, and specific to, your household.

Expenses which tend to increase are:

i). Utilities, ii). Drugs, iii). Recreation and Travel, iv). Telephone, v). Health Insurance, vi). Contributions and Gifts, vii). Medical and Dental Expenses, viii). Household Maintenance and Repairs, ix). Dining and Entertainment, x). Income Taxes and xi). Life Insurance.

Expenses which tend to decrease are:

i). Mortgage Payments, ii). Debt Repayment, iii). Food, iv). Property Taxes, v). Child Support and Alimony, vi). Clothing, vii). Transportation Costs, viii). Household Furnishing Costs, and ix). Income Taxes.

## Investor Questionnaire, Risk Tolerance, Risk Profile

The Investor Questionnaire helps determine the most appropriate asset mix for a specific level of risk tolerance. Investment theory and historical capital market data on returns suggest that, over long periods of time, there is a relationship between the level of investment risk assumed and the level of return that can be expected. In other words, in order for an Investor to attain higher potential returns, more times than not, the investor must be willing to accept higher levels of market and investment risk (sometimes referred to as 'Volatility of Return' or 'VoR'). Given this relationship between risk and return, a fundamental examination during the drafting of an Investment Policy for most any Investor's portfolio is, first, determining the amount of risk the Investor is willing to tolerate. In the world of investments, risk tolerance measures the degree to which an Investor is willing to accept volatility. An Investor's level of comfort with investment risk has a great influence on how aggressively or conservatively a portfolio's assets can be invested. Not unlike a scale, risk needs to be balanced on the other end with the Investor's desired return expectations. Investors must understand that desiring higher levels of investment returns must be coincided with a long-term outlook regarding market participation. Knee-jerk reactions to market swings, attempts to 'beat the market' as the saying goes, and reacting to 24/7 global market and economic news cycles, rhetoric, blogosphere and social media saturated with sounds, analyses, opinions and often distracting, misleading, untruthful and incomplete information and perspectives may only cause more harm than good, leading investors to destroy the value of their portfolios faster than they ever fathomed possible. Such reactions are highly unlikely to increase long-term investment returns, and, in all likelihood, will introduce investor stress, injure intellectual health & increase overall portfolio operating costs. Investors desirous of higher potential returns must understand that their portfolio may experience higher negative returns during severe market declines with unusually longer recovery periods, especially in and during excessively volatile and uncertain economic and geo-political times. An Investor's risk tolerance is scored based on three factors that impact investing decisions: time horizon, long-term goals and expectations, and short-term risk attitudes.

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## Governing, Supervising, Administering & Managing Your Portfolio

The performance of the securities in your Accounts, & which comprise your portfolio shall be "Governed, Supervised, Administered & Managed" on an ongoing basis.

The governance, supervision, administration & management with respect to your portfolio, & the portfolio's performance is, & shall continue to be, among the Firm's duties & responsibilities as a Fiduciary in accordance with our Adviser-Client relationship. This commitment also strives to support & foster the best possible environment in which you, the Client(s), are able to accomplish to the goals you have reviewed, discussed & outlined together with your Adviser Representative.

Such governance, supervision, administration & management with respect to your portfolio is to also oversee that your portfolio holdings, over a reasonable period of time, produce an acceptable return for you, the Client(s), in relationship to your risk tolerance, investment temperature & time horizon, among other important considerations regarding your portfolio assets, & contribute to the portfolio as anticipated while sustaining an acceptable level of risk.

## Disclosures

Past performance, positive or negative, is not a guarantee of future positive or negative results.

Participation in equities, variable investments and securities or bond markets involves risk including loss of some or all of your principal investment.

This report is generated to assist you in understanding the outstanding fees due and is intended for informational purposes only.

This material does not constitute an offer to sell or a solicitation of an offer to buy any security.

We have done everything in our power, and have made every effort, to acquire accurate results.

AboveRock LLC, any of its affiliated companies, or the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sessa "V. S." Nippani, cannot be held liable for any errors which may have been reported in the portfolio values sheets (aka Portfolio Summary), invoices or any other reports. If any such errors are identified, please notify us immediately and a new report (or reports) with the correct numbers/values/information will be generated for you promptly.

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Information regarding the Firm and its Associates may be found both at the Florida Office of Financial Regulation's website at <http://www.flofr.com> and at the Florida Department of State's website at <http://www.sunbiz.org>. Information regarding governing statutes including Chapters 517, 605, 608 and 621, among others, may be found at <http://www.leg.state.fl.us/statutes>.

Adviser and Adviser Representatives may only transact business in a state if first registered, excluded, or exempted from state Investment Adviser and Adviser Representative registration requirements. Follow-up and/or individualized responses to persons in a state by Adviser or an Advisory Representative that involve either the effecting of or an attempt to effect, transactions in securities or the rendering of personalized

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investment advice for compensation may require registration first unless an exemption or exclusion is available.

Please note that AboveRock LLC's Firm Brochure (Adviser's Form ADV Part 2A) and Brochure Supplement (Adviser's Form ADV Part 2B), combined as one document, has been filed with the state of Florida at <http://www.flofr.com>. This document, available at <http://www.adviserinfo.sec.gov>, must be read, understood and signed prior to engaging the representative via the Adviser. Before you consider working with us and/or sending monies to a custodian, you must understand and acknowledge that equity investing is long-term and variable in nature, involves loss of some or all of your principal and has no bank/FDIC, savings or credit union/NCUA or NCUSIF guarantee. In some situations, under certain circumstances and depending on where, how and in what your monies are invested, accounts may become eligible for SIPC protection. Please visit [www.sipc.org](http://www.sipc.org) for complete information. The loss of some, or all/100%, of your principal, and/or the erosion of purchasing power, may also apply to fixed-income investments in cases of corporate, institutional, agency, governmental or sovereign insolvency or bankruptcy, as applicable.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sessa "V. S." Nippani is also affiliated with REARM LLC, registered with the state of Florida via the Department of Business and Professional Regulation (DBPR) as a Real Estate Company, and serves as its Founder, Owner, President & Qualifying Broker. You may find more information at <http://www.myfloridalicense.com/dbpr> and <http://www.sunbiz.org>.

Adviser and Adviser Representatives are not attorneys, economists or CPA/tax attorneys and no information presented on this site must be considered as tax or legal advice. Tax and legal advice must be sought from a CPA and/or a tax attorney and when applicable, additional information regarding one's estate must also be sought from an estate planning attorney in your jurisdiction. Some of the views and opinions mentioned on this venue are meant for understanding and informational purposes only and represent the current, good faith perspective of the authors at the time of publication, are subject to change frequently without notice, must not be considered to be an absolute solution to any portfolio or an investment advisory model/strategy and must be coincided with other pertinent factors, expertise, knowledge, guidance and supervision of a qualified investment professional.

Information presented here is not, and may not, be construed as investment advice, an endorsement, agreement, a testimonial or a recommendation, an offer to sell, exchange, redeem, transfer or a solicitation, an advertisement or a promotion of an offer to buy any security, real estate, or legal, tax, estate or accounting advice.

Past performance, positive or negative, is not a guarantee of future positive or negative results.

Electronic mail messages, together with any attachments, when transmitted via the internet, may not be 100% secure and could potentially be breached, contain or contract viruses and other malware during transmission. AboveRock LLC and its affiliates do not accept liability and do not warrant that e-mail communications are virus or defect free. Please do not send unsecure attachments, non-public personal information or trading instructions via e-mail.

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Electronic mail messages and any messages sent to AboveRock LLC and its associated persons, including phone calls, may be recorded, reviewed, monitored and/or saved for quality assurance, training and compliance purposes in accordance with federal and state regulations and/or firm policies, as applicable.

Electronic mail messages, together with any attachments, may contain confidential and/or privileged information and are intended solely to be used by the individual/entity to whom they are addressed/directed. Any unauthorized review, use, printing, saving, copying, disclosure of, or distribution of content in, such digital correspondence/communication including any attachments is strictly prohibited. If you have received a message in error, please advise the sender via a reply e-mail and delete all copies immediately.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani reviews and approves the communication as well as content on this site.

Please know that the disclosures provided to you in this document are applicable to this document also & have been prepared by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, & therefore utilize words &/or terms such as "Site(s)" &/Or "Websites(s)".

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100518

## Investment Policy Statement

Client Name

Day, Month & Date, Year (&/Or MM/DD/YYYY)

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Please note that this document is customized, & has information which is also in IPS AdvisorPro (IPSAdvisor Pro, &/Or IPSAdvisorPro), an Investment Policy Statement (IPS) document subscribed to by the Adviser during Adviser's affiliation, & has in it, some information which has been reviewed &, as applicable, is being utilized by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of the Firm with permission asked by him, the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, & received through, IPS AdvisorPro, during his affiliation with IPS AdvisorPro over the years, and is being utilized by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani @ the Firm with permission.

The IPS AdvisorPro document has been provided by, & via, IPSAdvisor Pro the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani subscribed to, paid with respect to per year & purchased over several years during his subscription on behalf of the then Office Of Supervisory Jurisdiction (OSJ) Nippani & Associates LLC, & along the continuum, now with respect to AboveRock LLC, the Registered Investment Adviser.

The Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani who governs, supervises, administers, is responsible for, & births, journeys and arrives at one or more responsibilities, expectations & accountabilities regarding this matter and, on a continuous basis, identifies and records applicable factors, processes, policies & information in the Firm's documents, has addressed this item noted in this document. Any further inquiries shall be directed to him.

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### Investor Priorities (Rank and Initials), Limitations on Investment Holdings

On a scale of 1 to 5, with 1 being the least important and 5 the most, please rank the following by writing a number next to the objective along with your initials. This will further help your Adviser Representative in assessing your overall priorities which impact this Investment Policy Statement. Please bear in mind that your household may include assets, investments, accounts or holdings which may not be included in this Investment Policy Statement.

Initials / Investor Priorities / Ranking (listed in no particular order):

(\_\_\_\_) 1. Current Income (Income Need) - \_\_\_\_\_,

(\_\_\_\_) 2. Growth Potential - \_\_\_\_\_,

(\_\_\_\_) 3. Need for Liquidity - \_\_\_\_\_,

(\_\_\_\_) 4. Tax Efficiency - \_\_\_\_\_.

(\_\_\_\_) 5. Internal Costs & Fees - \_\_\_\_\_.

### Limitations &/Or Restrictions With Respect To Your Accounts

Limitations &/or restrictions regarding specific securities, investment holdings, types of investments &/or asset classes must appear here in this section to be applied, implemented, adhered to, or followed. Please enclose additional sheets if necessary. If none, please write "NONE" on the line below.

---

Please make sure that you have:

- a). reviewed this Investment Policy Statement,
- b). have initialed after ranking your priorities above,
- c). ensured that any and all of your questions, inquiries and concerns have been addressed and answered **IN HONOR WITH RESPECT TO ETERNAL LAW & ANCHORING PRINCIPLES** by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani, & by your Adviser Representative as respectfully required by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesha "V. S." Nippani on behalf of the Adviser, AboveRock LLC, & then
- d). have hand-written your names, signed & dated this document.

Once the above-noted steps have been completed, kindly return this page together with the next page (Agreement, Receipt) to your Investment Adviser Representative for your file at AboveRock LLC.

This is a compliance requirement.

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# Investment Policy Statement

Client Name

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## Agreement, Receipt

I/We have reviewed and agree with the tenets of this Investment Policy Statement (IPS) dated

\_\_\_\_\_, 20\_\_\_\_.

This Investment Policy Statement shall be reviewed at least annually.

This Investment Policy Statement is not effective until it has been processed by AboveRock LLC.

**This Investment Policy Statement shall terminate one year from the date this document has been processed by the Founder, Owner, President & Chief Compliance Officer of the Firm Sir & Mr. Bharadwaj "Brad" Venkata Sesa "V. S." Nippani on behalf of the Adviser, AboveRock LLC.**

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Client Name (Print)

Client Signature

Date Signed

---

Client Name (Print)

Client Signature

Date Signed

---

Authorized Decision Maker Name (Print)

When not applicable, please write NOT APPLICABLE

---

Authorized Decision Maker Signature

When not applicable, please write NOT APPLICABLE

Date Signed

---

Client Address

City

State

Postal Zip Code

---

Representative Name (Print)

Representative Signature

Date Signed

---

Representative's Address

City

State

Postal Zip Code

---

Founder, Owner, President & Chief Compliance Officer's Name

---

Founder, Owner, President & Chief Compliance Officer's Signature

AboveRock LLC

Date Processed

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