

Polar Investment Counsel, Inc.

Brokers and Investment Advisors; Member NASD, NFA, MSRB, SIPC
Website: www.polarinvest1.com

PICI Supervisory & Procedures Manual Acknowledgement of Associated Persons

The undersigned associate acknowledges that they have access to the S&P Manual and are responsible for knowing its contents and have read and understood its contents to the level of being able to answer questions about it from supervisors and regulatory auditors and to put its principles into practice. The undersigned understands that the S&P Manual is continually updated and agrees to take responsibility for reviewing and understand any updates or supplements published by Polar Investment Counsel, Inc.

Included in this Manual are special Firm Policies on the following subjects:

- Outside Business Activities and Private Securities transactions (“Selling Away”)
- Personal Accounts and Trading
- Insider Trading
- Improper Conduct
- Cold Calling
- Company Email and Internet Presence
- Business Equipment and Electronic Requirements

The undersigned acknowledges by their signature on each of these Policies that they have read and understand the Policies and are responsible for abiding by their provisions and that the undersigned has had an opportunity of clarifying any Firm policy or procedure by speaking with a Senior Principal of the Firm.

Printed Name

Title

Signature

Dated

Rep ID#

Office #

HOME OFFICE USE ONLY: Must be received by due date to qualify for Firm element CE credit.

Date received: _____ CE Credit: 4 hours

PICI CE Supervisory Signature