

Adele Polakoff

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This Brochure Supplement provides information about Ms. Polakoff that supplements the National Asset Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact the Compliance Department at 561-981-1000 if you did not receive National Asset Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about this financial advisor is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Adele Millicent Polakoff, CRD # 865402

Year of Birth: 1942

Education: Advanced Degree in Education, Montessori, Fairleigh Dickinson

Business experience (for past five years):

- ❖ Investment Advisor Representative, National Asset Management (03/2021-Present)
- ❖ Registered Representative, National Securities Corp., (03/2021-Present)
- ❖ Investment Advisory Representative, Winslow, Evans & Crocker, (10/2018-03/2021)
- ❖ Financial Advisory/Wealth Advisory, Morgan Stanley, (12/2004-10/2018)

Item 3 - Disciplinary Information

The supervised person has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system at www.finra.org/brokercheck. You can access this disciplinary history by searching the name of the supervised person and reviewing the Disclosure section.

Item 4- Other Business Activities

Ms. Polakoff uses the business name ECAP Wealth Management. Ms. Polakoff uses this business name for marketing and/or tax purpose but offers securities and investment advice through the registered broker-dealer or registered investment advisor described below. National Asset Management is not affiliated with ECAP Wealth Management.

Ms. Polakoff is a registered representative with National Securities Corporation ("NSC"), member FINRA/SIPC, as well as an investment advisory representative ("IAR") of NAM. Registered representatives of NSC provide securities brokerage services for commissions, and receive a portion of the brokerage commissions paid to NSC. They may also receive a portion of any ongoing distribution of service (trail) fees from the sale of mutual funds or from variable annuity purchases. The dual registration presents an inherent conflict of interest and an incentive to recommend investment products based on the compensation received, rather than on a client's needs. However, in accordance with fiduciary duties of an IAR and as a matter of firm procedure, IARs assist clients in making decisions regarding whether to establish a brokerage or an advisory account (and determine the types of transactions that will take place through each account if a client has both accounts) based on the clients' goals, objectives, risk tolerance and other factors. Further, as a matter of procedure, NAM does not generally permit front-end or back-end load mutual funds in the advisory program, or any other class that has high trail fees. If such mutual

funds are transferred into an advisory account, advisory fees will be suppressed if a front-end or back-end load has been charged or there are high trail fees. Clients have the option to purchase investment products through other broker-dealers or advisors.

Ms. Polakoff also offers fixed insurance products through National Insurance Corporation.

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Item 5- Additional Compensation

There is no additional compensation to report for this financial advisor.

Item 6 - Supervision

NAM provides investment advisory and supervisory services in accordance with the NAM Policies and Procedures Manual. Rene Kageff has primary responsibility for supervising advisory activities in accordance with NAM's Policies and Procedures Manual. Such oversight will include regular review of client communications and investment advice offered by this financial advisor. Records of all client trades placed by this financial advisor are archived and available for review. Rene Kageff may be contacted at 561-869-5239.