



Code of Ethics and Professional Responsibility

- Code of Ethics and Professional Responsibility Always place the interest of the clients first and never benefit at the expense of advisory clients.
- Always act in an honest and ethical manner, including in connection with, and the handling and avoidance of, actual or potential conflicts of interest between personal and professional relationships.
- Always maintain the confidentiality of information concerning the identity of security holdings and financial circumstances of clients.
- Fully comply with all applicable laws, rules and regulations of federal, state and local governments and other applicable regulatory agencies.
- Proactively promotes ethical and honest behavior with the Advisor, including, without limitation, the prompt reporting of violations of, and being accountable for adherence to, this Code of Ethics.