

CODE OF ETHICS

We maintain a Code of Ethics, which is based upon the principle that our firm and employees owe a fiduciary duty to our clients, including:

- The duty to have a reasonable, independent basis for the investment advice provided.
- The duty to obtain best execution for client transactions.
- The duty to ensure that investment advice is suitable for a client's objectives, needs, and circumstances.
- The duty of loyalty to our clients.

A copy of our complete Code of Ethics is available upon request.