

CODE OF ETHICS. The client's best interest is unquestionably the highest priority, so a code of ethics is:

Our fiduciary duty to our advisory clients requires that persons associated with this firm always strive to:

- Deal openly and honestly with our clients, putting their interests first

- Be diligent in the knowledgeable execution of our professional duties

- Inform management and clients of conflicts of interest

- Provide current, correct and complete information to clients so that their decisions may be based on the best facts and considerations

- Remain free from any self-dealing

Maintain the confidentiality of each individual's private information as required and allowed by law, to do no harm to clients other than to provide to legal authorities information that is required by legal subpoenas