

## Code of Ethics

Edward L Roth, CFP® and his Code of Ethics were created and embody our personal and professional lives with our client's interest first in mind. The code is the standard of conduct for all "supervised" and "access" persons. The code is not only a part of our fiduciary responsibility, but also one that is greatly fostered in our culture. Along with the code, all supervised persons are required to comply with all applicable securities laws. A "supervised person" includes a director, officer, partner, employee, or any other person who provides advice on behalf of the adviser and is subject to the adviser's supervision and control.

Your Financial Planner shall offer and provide profession services with integrity. In deciding what is right or wrong, your financial planner should rely on his or her integrity as the appropriate touchstone. Integrity demands honesty and candor, which must not be subordinated to personal gain and advantage. Within the characteristic of integrity, allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles. Integrity requires the financial planner to observe not only the letter but also the spirit of this Code of Ethics.

Your Financial Planner shall be objective in providing services to clients. Objectivity requires intellectual honesty and impartiality. It is an essential quality for any profession. Regardless of the particular service rendered or the capacity in which a financial planner functions, a CFP® practitioner, professional, or certificant should protect the integrity of his or her work, maintain objectivity and avoid subordination of his or her judgment that would be in violation of this Code of Ethics.

Your Financial Planner shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the Financial Planner is engaged. One is competent only when he or she has attained and maintained an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation or client referral is appropriate.

Your Financial Planner shall perform professional services in a manner that is fair and reasonable to clients, principles, partners, and employers, and shall disclose conflict(s) of interest in providing such services. Fairness requires impartiality, intellectual honesty and disclosure of conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Your Financial Planner shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process, to defend against charges of wrongdoing by the Financial Planner in connection with a civil dispute between the Financial Planner and client. A client, by seeking the services of a Financial Planner, may be interested in creating a relationship of personal trust and confidence with the Financial Planner. This type of relationship can only be built upon the understanding that information supplied to the Financial Planner will be confidential. In order to provide the contemplated services effectively and to protect the client's privacy, the Financial Planner shall safeguard the confidentiality of such information.

Your Financial Planner's conduct in all matters shall reflect credit upon the profession. Because of the importance of the professional services rendered by the Financial Planner, there are attendant responsibilities to behave with dignity and courtesy to all these who use those services, fellow professionals, and those in related professions. A Financial Planner also has an obligation to cooperate with other Financial Planners to improve the quality of services. It is only through the combined efforts of all Financial Planners, in cooperation with other professionals, that this vision can be realized.

Your Financial Planner shall act diligently in providing professional services. Diligence is the provision of services in a reasonably prompt and thorough manner. Diligence also includes proper planning for and supervision of, the rendering of professional services.

Any "access person" (i.e. supervised person that has access to nonpublic information regarding recommendations to clients on the purchase or sale of securities, clients' trading information or nonpublic information regarding a portfolio holding of an affiliated mutual fund, or involved in providing investment advice to clients) shall upon receipt of this information complete and submit a Personal Securities Transaction report within 10 days and annually thereafter. This information must be current as of the date the individual becomes an access person or, for an annual report, the date the report is submitted. Access persons must report their personal trading activities, if any, quarterly to the adviser's Chief Compliance Officer within 30 days after the close of the quarter. All advisers must gain pre-approval in any initial public offering or private placement. Any violation of the code shall be reported to the Chief Compliance Officer.

Certified Financial Planner Board of Standards Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER™ and CFP® in the U.S., which it awards to individuals who successfully complete CFP Board's initial and ongoing certification requirements.