

*January 2, 2008*

## **Principle 1 – Integrity**

### ***Provide professional services with integrity.***

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. All ALTUS Wealth Coaches are placed in positions of trust by clients, and the ultimate source of that trust is your advisor's personal integrity. All employees demonstrate an understanding of the implied trust our clients put in every member of our firm.

## **Principle 2 – Objectivity**

### ***Provide professional services objectively.***

Objectivity requires intellectual honesty and impartiality. Your ALTUS Wealth Coach should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

## **Principle 3 – Competence**

### ***Embrace a continuing commitment to learning and professional improvement.***

At ALTUS, ongoing educational requirements ensure that all members of our staff maintain the knowledge and skill necessary to be leaders and teachers within their position and our profession. Competence also includes the wisdom to recognize the limitations of knowledge and when consultation with other professionals is appropriate or necessary.

## **Principle 4 – Fairness / Disclosure / Fiduciary Standard**

### ***Be fair and reasonable in all relationships - Disclose all conflicts of interest.***

Fairness is treating others in the same fashion that you would want to be treated. Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires. At ALTUS, we hold ourselves to the highest fiduciary standard - making the utmost effort to do that which is in the best interests of the client.

## **Principle 5 – Confidentiality**

### ***Protect the confidentiality of all client information.***

Confidentiality means ensuring that information is accessible to those authorized to have access and no others without the express permission of the client.

## **Principle 6 – Professionalism**

### ***Behave with dignity and courtesy to all.***

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business related activities.

## **Principle 7 – Diligence**

### ***Provide professional services diligently.***

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.



## Wealth Coach Code of Ethics

*January 2, 2008*

All Associated Persons are required to report any violation of the Code, by any person, to the Chief Compliance Officer or other appropriate person of the Company immediately. Such reports will be held in confidence.

Associated persons must place the interests of Advisory Clients first. All Associated Persons must scrupulously avoid serving their own personal interests ahead of the interests of the Company's Advisory Clients. In addition, Associated Persons must work diligently to ensure that no client is preferred over any other client.

All Associated Persons are naturally prohibited from engaging in any practice that defrauds or misleads any client, or engaging in any manipulative or deceitful practice with respect to clients or securities.

Associated persons must conduct all personal securities transactions in full compliance with this Code. Doubtful situations always should be resolved in favor of Advisory Clients and in cooperation with the Chief Compliance Officer. Technical compliance with the Code's provisions shall not automatically insulate from scrutiny any securities transactions or actions that could indicate a violation of the Company's fiduciary duties.

Personal transactions in securities by Associated Persons must be accomplished so as to avoid even the appearance of a conflict of interest on the part of such personnel with the interests of the Company's clients. Likewise, Associated Persons must avoid actions or activities that allow (or appear to allow) a person to profit or benefit from his or her position with the Company at the expense of clients, or that otherwise bring into question the person's independence or judgment.

When any Associated Person faces a conflict or potential conflict between their personal interest and the interests of clients, they are required to immediately report the conflict to the Chief Compliance Officer for instruction regarding how to proceed.

The recommendations and actions of the Company are confidential and private matters. Accordingly, the Company has adopted a Privacy Policy to prohibit the transmission, distribution or communication of any information regarding securities transactions in client accounts or other non-public information, except to broker/dealers or other bona fide service providers in the ordinary course of business. In addition, no information obtained during the course of employment regarding particular securities (including internal reports and recommendations) may be transmitted, distributed, or communicated to anyone who is not affiliated with the Company, without the prior written approval of the Chief Compliance Officer.

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## General Requirements of an SEC Code of Ethics

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**Non-Reportable Securities.** Specifically exempt from the definition of Covered Securities are: treasury securities; bank certificates of deposits, commercial paper, etc.; money market fund shares; shares of open-end mutual funds that are not advised or sub-advised by the Company; and units of a unit investment trust ("UIT") if the UIT is invested exclusively in unaffiliated mutual funds.

**Manipulative Practices.** Section 9(a)(2) of the Securities Exchange Act of 1934, as amended (the "Exchange Act") makes it unlawful for any person, acting alone or with others, to effect a series of transactions in any security registered on a national securities exchange creating actual or apparent active trading in such security or raising or depressing the price of the security, for the purpose of inducing the purchase or sale of such security by others.

**Client Priority.** Clients must always receive the best price, in relation to employees, on same day transactions. Employees of the Company must first give priority on all purchases and sales of securities to the Company's clients, prior to the execution of transactions for their proprietary accounts, and personal trading must be conducted so as not to conflict with the interests of a client