

I.S.S.U.E.® INC.
Investment Strategies Simply Understood & Executed®

PRIVACY POLICY & CODE OF ETHICS

PRIVACY POLICY:

***I.S.S.U.E.® INC.** (Firm) will not disclose any confidential personal information about our Clients or former Clients to anyone, except by law.*

***I.S.S.U.E.® INC.** will internally safeguard the Client's non-public personal information by restricting access to only those employees who provide products or services to the Client or those who need access to the Client's information to service the Client's account. In addition, the Firm will maintain any physical or electronic data, and procedural safeguards that meet federal and/or state standards to guard the Client's non-public personal information.*

CODE OF ETHICS:

Conduct:

All representatives, employees and "access persons" of **I.S.S.U.E.® INC.** will conduct their work with the integrity, objectivity, fairness, full disclosure, confidentiality, competence, due diligence and professionalism required to adhere to the highest fiduciary standards for all Clients.

Integrity - Adherence to moral and ethical principles by subordinating person gain and advantage for the benefit of the Client.

Objectivity - Expressing or dealing with the Clients' facts or conditions without distortion by personal feelings, prejudices, or interpretations.

Fairness – Impartial and honest conduct toward the Client with full disclosure of conflicts and free from self-interest, prejudice, or favoritism.

Full Disclosure – Divulging to the Client all known actual and potential conflicts of interest.

Confidentiality – Non-disclosure of Client's Personal information without specific consent of Client or as required by legal process.

Competence – For the benefit of the Client, attain and maintain an acceptable level of knowledge and skill to provide meaningful services or the wisdom to know the limitations in providing those services.

Due Diligence – The exercising of proper planning, thoroughness and promptness to avoid harm to the Client.

Professionalism – Providing the quality of services expected by the Client utilizing the characteristics of Integrity, Objectivity, Fairness, Full Disclosure, Confidentiality, Competence, and Due Diligence.

Compliance:

It is the intent and directive of **I.S.S.U.E.® INC.** for the company, all employees, and "access persons" to adhere to all Federal and State security laws in both the letter and spirit for which the laws were created.

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Access Person:

An access person is defined as

- 1) Any supervised persons who a) has access to nonpublic information regarding any Client's purchase or sale of securities, or nonpublic information regarding the portfolio holdings of any reportable fund, and/or b) is involved in making securities recommendations to Clients, or who has access to such recommendations that are nonpublic.
- 2) If providing investment advice, all directors, officers and partners are presumed to be access persons.

All access persons, and their spouses, are required to adhere to the personal securities transactions and holdings requirements addressed in the Investment Adviser Act of 1940, Rule 204A-1 and the SEC 17 CFR Parts 270, 275 and 279, [Release Nos. IA-2256, IC-26492; File No. S7-04-04], RIN 3235-AJ08, Investment Adviser Codes of Ethics.

Initial, quarterly, and annual reports of personal security holdings and transactions are mandatory. Prior written approval is required before the transaction of any personal security, especially IPOs. Prior approval of brokers and brokerage accounts are required.

To maintain the highest fiduciary standards, Clients' investment opportunities are considered primary and paramount to an access person's personal securities holdings and transactions in all circumstances.

Reporting Violations, Education, Adviser Review and Recordkeeping:

All violations, by any employee or access person, should be reported immediately. Failure to do so by any party may result in termination.

Every employee and access person will be required to attend annual reviews of the privacy policy and code of ethics, provided opportunities for discussion and questions, and required annually to sign affidavits attesting to the receipt of the privacy policy and code of ethics and their understanding of the contents and requirements.

The Compliance Officer will review all necessary reports and compliance documents.

The Compliance Officer will maintain all required reports and compliance documents as prescribed by Rule 204-2.