



## Code of Ethics & Privacy Policy

### **Rhoads Lucca Capital Management (RLC)**

#### **Code of Ethics (as written in RLC Supervisory Procedures - Item 4)**

RLC and all of its advisors and employees will abide by honest and ethical business practices at all times. These practices include, but are not limited to:

- Placing clients' priorities and benefits first.
- Helping clients identify their tolerance for investment risk and guiding them towards investments that do not exceed their identified risk tolerance.
- Helping clients determine an acceptable level of account withdrawals to maintain their stated long-term lifestyle goals, as applicable, based on information provided by clients.
- Investing client assets according to the stated investment guidelines and strategies of their selected portfolio models and promptly informing clients of any changes in those guidelines and strategies.
- Providing complete, honest and regular communication to clients on the status of their accounts and the relative performance of the RLC portfolio models.
- Maintaining confidentiality of client information. (RLC Privacy Policy)
- Fully informing clients when a potential conflict of interest exists that may influence the advice being sought.
- Not placing discretionary investment orders without having clients' written authorization of discretionary power.
- Not inducing trading in a customer's account that is excessive in size or frequency in view of the financial resources and character of the account ("churning").
- Not borrowing money or securities from, or lending money or securities to, a customer.
- Not investing in any unregistered or unlawful securities.
- Not placing, or recommending that a client place, an order to buy or sell a security through an agent that is not properly licensed or is otherwise inappropriate.
- Reporting promptly to a member of the RLC management team any violations of the "Code of Ethics" and "Privacy Policy."
- All individuals employed by RLC must act in accordance with all applicable Federal and State regulations governing registered investment Advisory practices.

#### **Privacy Policy**

We will keep confidential all information concerning client identity, financial affairs, and investments, except as the client otherwise agrees or is as required by law.