

Code of Ethics

Introduction

As a fiduciary, 3. Ingenuity has a duty of utmost good faith to act solely in the best interest of each of our clients. Our clients entrust us with their funds, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all employees to act with the utmost integrity in all of our dealings. This fiduciary duty is the core principle underlying the Code of Ethics and Personal Trading Policy, and represents the expected base of all our dealing with our clients.

Standards of Conduct

This Code of Ethics consists of the following core principles:

1. The interest of clients will be placed ahead of the firm's or any employee's own investments interests.
2. Employees are expected to conduct their personal securities in a manner to avoid any actual or perceived conflict of interest with the clients. Employees with questions regarding the appearance of a conflict with a client should consult with 3. Ingenuity's Principal/Owner regarding item before taking action that may result in an actual conflict.
3. Employees will not take inappropriate advantage of their position with the firm
4. Employees are expected to act in the best interest of each of our clients.
5. Employees are expected to comply with federal securities laws.

Protection of Material Non-public Information

Employees are expected to exercise diligence and care in maintaining the protecting our client's non-public, confidential information. Employees are also expected to not divulge information regarding 3. Ingenuity's securities recommendations or clients securities holdings to any individual outside the firm except:

1. As necessary to complete transactions or account changes (for example: communications with brokers and custodians).

2. As necessary to maintain or service a client or his/her account (for example: communications with a client's accountant).
3. With various service providers providing administration function for 3. Ingenuity (such as our technology service provider), only after we have entered into an agreement that prohibits the service provider from disclosing or using confidential information except as necessary to carry out its assigned responsibility and only for the purpose.
4. As permitted by law.

Personal Conduct

As noted above, employees are expected to conduct themselves with the utmost integrity and to avoid any actual or perceived conflict with our clients. In this spirit, the following are required of employees:

1. **Acceptance of Gifts** – employees are prohibited from receiving any gift, gratuity, hospitality, or other offering of more than *de minimus* value from any person or entity doing business with 3. Ingenuity. This gift policy generally excludes items or events where the employee has reason to believe there is a legitimate business purpose.
2. **Service as Director for an Outside Company** – Any employee wishing to serve as director for an outside company (public or private) must first see the approval of 3. Ingenuity Principal/Owner. The Principal/Owner, in reviewing the request, will determine whether such service is consistent with the interest of the firm and our clients.
3. **Outside Business Interests** – Any employee wishing to engage in business activities outside of 3. Ingenuity's business must seek approval from the Principal/Owner and, if requested, provide periodic reports to the Principal/Owner summarizing those outside business activities.
4. **Annual Employee Acknowledgement** – New employees must acknowledge they have read and they understand and agree to comply with the Code of Ethics. All employees are required to acknowledge as such annually in connection with the firm's annual policy manual acknowledgement process.

Signed: Michael McTighe - Owner