

Soltis Investment Advisors

Code of Ethics and Statement on Personal Investing and Insider Trading 2018

General Statement of Fiduciary Policy:

Soltis Investment Advisors (Soltis) believes in integrity, hard work, prudent decision-making, and professionalism. Soltis seeks to foster a reputation for the above qualities which results in Client Confidence and Trust in our firm. We recognize that the Trust and Confidence of the Client is a critical business asset that is highly valued and must be protected. To this end, any activity which creates even the suspicion or which gives rise to or appears to give rise to any breach of fiduciary duty owed to any Client must be avoided and is prohibited.

Soltis has a fiduciary duty to each and every client of the firm, and as such we believe that we owe our clients a duty of undivided loyalty. The policy of Soltis is to protect the interests of each of the firm's clients and to place our client's interests first and foremost in each and every situation. The firm's fiduciary duty also includes providing full and fair disclosure of all relevant facts and any potential or actual conflicts of interest. Soltis demonstrates an utmost and exclusive duty of loyalty and good faith to its clients by providing recommendations that are suitable, and seeking best execution of all client transactions.

Soltis' endeavors at all times to operate in conformity with federal and/or applicable state laws and to conduct business in the highest ethical and professional manner. In the course of professional services to our clients, Soltis' team members shall not engage in conduct involving dishonesty, fraud, deceit or misrepresentation, or knowingly make a false or misleading statement to a client, employer, employee, professional colleague, governmental or other regulatory body or official, or any other person or entity. Soltis team members exercise reasonable care to avoid misleading clients.

Code of Ethics:

Since the founding of Soltis Investment Advisors, the commitment to create a money management business that is built upon a non-conflict of interest foundation has been the objective of the principals. Having made much progress toward this objective, the employees of Soltis Investment Advisors have adopted the following Code of Ethics, which reflects the mission of Soltis. The development and institution of this Code of Ethics are paramount to the way Soltis conducts business.

Soltis Ethics Committee: Soltis has charged the Board of Managers (BOM) to review any alleged violations of the Soltis Code of Ethics and for advising employees with ways to enhance their individual awareness and obligations of the Code. Employees are required and encouraged to report any actual or potential violations of the Code to a member of the BOM or anonymously via Soltis' compliance software.

Introduction

This Code of Ethics is an expression of Soltis' commitment to their clients, colleagues, the public, and fellow employees. It is written to provide guidance and performance measurements that will perpetuate the goal of Soltis to create a fair and professional environment to conduct our investment management business. The Code serves to educate our employees, protect the reputation of the firm, and guard against violating any securities laws.

Principle #1 Integrity: To have the courage to make the tough decisions consistent with our core values. Soltis' integrity requires management and operations to function in a sound, strictly moral fashion. Committed to build wealth, Soltis will seek to do what is in the clients' best interest, as we consult and direct the prudent investor. As we are in a position of trust, we must act at all times with the utmost integrity.

Principle #2 Knowledge: To recognize the power of what worked yesterday, what is working now, and what will work in the future. The value of knowledge requires Soltis to be committed to create and promote an environment of learning and academic excellence. The Soltis team has an ongoing commitment to learning and professional improvement to maintain an adequate level of knowledge and skill in providing investment services to our clients.

Principle # 3 Diligence: To value hard work and the tenacity needed to succeed throughout changing markets. Soltis will earnestly seek through the application of steady, persistent efforts to look over the interests of its clients and employees; to strive consistently towards the goals of its clients.

Principle # 4 Experience: To use the track record of past successes as a measurement for future performance, leveraging the awareness of past occurrences to better anticipate the risk and opportunities of tomorrow.

Principle # 5 Independence: To be free to always choose what is in the best interest of our clients. Taking the best interest of the clients and adding the skills of Soltis to help those clients in better managing the financial life so optimal decisions may be made. The Soltis team exhibits objectivity by displaying intellectual honesty and impartiality.

Principle # 6 Accountability: To willingly assume responsibility for our investment advice and service to our clients. Soltis' personnel will also remain engaged to answer any questions concerning the service, investment performance, and account status of each client. The Soltis Team is committed to providing professional services in a manner that is a fair and reasonable to clients, principals, and team members, and discloses any conflicts of interest in providing such services.

Principle # 7 Confidentiality: To Keep all Confidential Client information protected and confidential in order to safeguard the privacy of our clients and maintain the integrity of our services.

Restrictions on Employee Personal Investing:

Policy: Soltis Investment Advisors' policy allows employees to maintain personal securities accounts provided any personal investing by an employee in any accounts in which the employee has a beneficial interest, including any accounts for any immediate family or household members, is consistent with Soltis Investment Advisors' fiduciary duty to its clients and consistent with regulatory requirements. Each employee must identify any personal investment accounts and report all reportable transactions and investment activity on a quarterly basis to the firm's Compliance Officer. Employees are not allowed to advise or direct clients in the purchase of securities that are outside of the firm's recommended portfolios without the permission of the Firm's Chief Compliance Officer and Chief Investment Officer.

Procedure

Soltis Investment Advisors has adopted procedures to implement the firm's policy regarding personal securities transactions and reviews to monitor and insure the firm's policy is observed, implemented properly and amended or updated, as appropriate, which can be summarized as follows:

- Employees are to identify any personal investment account and any accounts in which the employee has a beneficial interest, including any accounts for the immediate family and household members, upon hire, quarterly thereafter and upon opening or closing any account(s).
- Employees must report all required information for covered personal securities transactions on a quarterly basis within 30 days of the end of each calendar quarter to the Compliance Officer or other designated officer.
- The Compliance Officer will review all employees' reports of personal securities transactions for compliance with the firm's policies, including the Insider Trading Policy, regulatory requirements, and the firm's fiduciary duty to its clients, among other things.
- Employees must seek and receive pre-clearance approval before executing any personal trades of individual stocks, options, bonds and ETF's that are on the Soltis' Restricted List. The Restricted List includes any security held in any Soltis model portfolio as well as and security of a company that Soltis provides or is actively seeking to provide financial services to. If an employee is invested in one of Soltis' model portfolios, preclearance requests are not required for trades resulting from the management of those portfolios. Pre-clearance approval is also required for any private equity or private placement offering deemed to be a security.

Insider Trading:

Policy

Soltis Investment Advisors' policy prohibits any employee from acting upon, misusing or disclosing any material non-public information, known as inside information. Soltis also maintains a policy prohibiting transactions in publically traded companies with whom Soltis does business or whom it is seeking to do business.

Any instances or questions regarding possible inside information must be immediately brought to the attention of the Compliance Officer or senior management, and any violations of the firm's policy will result in disciplinary action and/or termination.

Material Information: Information is "material" when there is substantial likelihood that a reasonable investor would consider it important in making his or her investment decisions. Generally, this is information whose disclosure will have a substantial effect on the price of a company's securities. Information regarding the following topics should be considered material in the insider trading context:

- Dividend changes
- Earnings results, changes in previously released earnings estimates
- Corporate reorganizations or takeovers
- The acquisition or loss of a major contract
- A major purchase or sale of company assets
- An event of default
- Knowledge of forthcoming press coverage of a company's affairs whether positive or negative

Procedure

All trading of individual stocks is closely monitored by the Compliance Officer. Any abnormal or unusual trading patterns will be scrutinized and reviewed. The Compliance Officer has the right to question and probe into any suspected trading abnormalities. All inquiries will be documented with confirms and written explanation. Soltis Investment Advisors has adopted various procedures to implement the firm's insider trading policy and reviews to monitor and insure the firm's policy is observed, implemented properly, and amended or updated, as appropriate, which may be summarized as follows:

- The Insider Trading Policy is distributed to all employees, and new employees upon hire, and requires a written acknowledgement by each employee
- Employees must disclose personal securities accounts and report at least quarterly any reportable transactions in their employee and employee-related personal accounts to the Compliance Officer

- Employees must report to the Compliance Officer all business, financial or personal relationships that may result in access to material, non-public information
- The Compliance Officer reviews all personal investment activity for employee and employee-related accounts
- The Compliance Officer provides guidance to employees on any possible insider trading situation or question
- Soltis Investment Advisors' Insider Trading Policy is reviewed and evaluated on a periodic basis and updated as may be appropriate
- The Compliance Officer prepares a written report to management and/or legal counsel of any possible violation of the firm's Insider Trading Policy for implementing corrective and/or disciplinary action
- Employees must obtain approval from the Compliance Officer before investing in an initial public offering (IPO) or Private Placement
- Soltis maintains a list of restricted securities in which employees are prohibited from trading. The list includes at minimum any publically traded companies with whom Soltis conducts or is seeking to conduct business
- Soltis monitors employee trading to ensure no transactions violate the restricted list policy

Protection of Material Nonpublic Information:

Procedure

Soltis Investment Advisors has adopted various procedures to implement the firm's policy and reviews to monitor and insure the firm's policy is observed, implemented properly and amended or updated, as appropriate, which may be summarized as follows:

Non-Disclosure of Client Information

Soltis Investment Advisors maintains safeguards to comply with federal and state standards to guard each client's nonpublic personal information. Soltis Investment Advisors does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:

As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account; as required by regulatory authorities or law enforcement officials who have jurisdiction over Soltis Investment Advisors, or as otherwise required by any applicable law; and to the extent reasonably necessary to prevent fraud and unauthorized transactions.

Employees are prohibited, either during or after termination of their employment, from disclosing nonpublic personal information to any person or entity outside Soltis Investment Advisors, including family members, except under the circumstances described above. An employee is permitted to disclose nonpublic personal information only to such other employees who need to have access to such information to deliver our services to the client.

Security of Client Information

Soltis Investment Advisors restricts access to nonpublic personal information to those employees who need to know such information to provide services to our clients.

Any employee who is authorized to have access to nonpublic personal information is required to keep such information in a secure compartment or receptacle on a daily basis as of the close of business each day. All electronic or computer files containing such information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving nonpublic personal information, if appropriate at all, must be conducted by employees in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

Privacy Notices

Soltis Investment Advisors will provide each natural person client with initial notice of the firm's current policy when the client relationship is established. Soltis Investment Advisors shall also provide each such client with a new notice of the firm's current privacy policies at least annually. If, at any time, Soltis Investment Advisors adopts material changes to its privacy policies, the firm shall provide each such client with a revised notice reflecting the new privacy policies. The Compliance Officer is responsible for ensuring that required notices are distributed to the Soltis Investment Advisors' consumers and customers.

Gifts & Entertainment

Policy:

Soltis recognizes a conflict of interest occurs when the personal interests of employees interfere or could potentially interfere with their responsibilities to the firm and its clients. Employees should not accept or offer gifts, favors, entertainment or other things of value that could be viewed as overly generous or aimed at influencing decision making or making any employee feel beholden to any firm Soltis does business with or making any client feel beholden to Soltis or its employees. The following guidelines address specific areas of Soltis' gifting policy.

Gifts: No employees may receive any gifts, services, or other things of more than token value from any person or entity that does business with or on behalf of Soltis. No employee may give or offer any gift of more than token value to existing clients, prospective clients, or

any entity that does business with or on behalf of Soltis without pre-approval by the Chief Compliance Officer.

Cash: No employee may give or accept cash gifts or cash equivalents to or from a client, prospective client, or any entity that does business with or on behalf of Soltis. Gift certificates that are not convertible to cash are acceptable forms of gifts.

Entertainment: No employee may provide or accept extravagant or excessive entertainment to or from a client, or any person or entity that does or seeks to do business with or on behalf of Soltis.

Seminars and Conferences: Soltis employees shall not attend conferences, seminars, or special events sponsored by brokers, consultants, or investment companies or portfolio companies unless all travel and lodging expenses associated with such conferences, seminars or special events are paid by Soltis. Employees may accept meals and entertainment of reasonable value provided to participants in conjunction with such seminars, conferences, and special events and in certain circumstances the waiver of the seminar or conference fee. Employees may accept any and all travel related expenses when invited to any industry related speaking engagement.

Exceptions to any rules in this section may be approved by the Compliance Committee provided the exception is deemed to still honor the spirit of the gifting policy. Additional rules apply when working with clients subject to ERISA. Soltis' complete gifting rules are described in their Policies and Procedures manual with which employees are required to comply.

Procedure:

- Soltis maintains an annual gift log that summarizes key information of any gifts given or received.
- Soltis requires gift requests be submitted for pre-approval or ratification via its compliance software.

Political Contributions (Pay-to-play rules)

Soltis recognizes that it is never appropriate to make or solicit political contributions, or provide gifts or entertainment for the purpose of improperly influencing the actions of public officials. Accordingly, our firm's policy is to restrict certain political contributions made to government officials and candidates of state and state political subdivisions who can influence, or have the authority for hiring, an investment adviser. In an effort to ensure the policy is adhered to, the following procedures are implemented.

Procedure:

- Employees sign an annual attestation affirming their compliance to all policies and procedures.
- Soltis requires that all political contributions made by employees and/or their respective households must be pre-approved by the CCO or Board.

- Declared political contributions are audited against actual contributions made and reported in publically available databases.

Acknowledged Receipt of Code of Ethics:

Your signature below affirms that you have again read and, during the past year to the best of your knowledge, have complied with the Soltis Code of Ethics and compliance policies and procedures. Your signature below constitutes your annual certification as to your understanding and agreement to be in compliance with the firm’s code of ethics and policies and procedures detailed in our the Soltis Policies and Procedures Manual. As an employee of Soltis Investment Advisors Inc. you acknowledge and agree to comply with our firm code of ethics, policies and procedures, disclose any outside business/other activities, non-custodial securities holdings and the personal securities accounts (on a quarterly basis) for any members of your immediate household and current “beneficial ownership” accounts.

Employee Date