



Code of Ethics

Our Code of Ethics ("Code") applies to all associates, officers, and employees of CapAcuity and its affiliates (collectively, the "Company"). Such covered individuals are referred to herein collectively as the "covered parties." The Code sets out principles to guide how our employees conduct various activities.

The Company has and will continue to uphold a high level of business ethics and personal integrity in all transactions and interactions. To this end, our Code is intended to:

- emphasize CapAcuity's commitment to ethics and compliance with the law
- set forth basic standards of ethical and legal behavior
- provide reporting mechanisms for known or suspected ethical, compliance, or legal violations
- help prevent and detect wrongdoing

Additionally, our Code provides guidance to covered persons on compliance with laws, rules, regulations, and practices; a mechanism for reporting financial and investment activities; and guidelines for protecting material non-public information and for reporting outside business activities, gifts, and entertainment.

Importantly, our Code provides guidelines on how we address conflicts of interest and how covered persons who become aware of a conflict or potential conflict should bring it to the attention of the Chief Compliance Officer.

Covered parties should consult with the Chief Compliance Officer or other appropriate personnel about known or suspected illegal or unethical behavior. No retaliatory action will be permitted against anyone making such a report in good faith or assisting in an investigation.

For more information on our Code of Ethics, please contact your CapAcuity representative.