

Lesjak Planning Corporation

Code of Ethics

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February 1, 2005

To All Lesjak Planning Employees,

Lesjak Planning Corporation and its employees are committed to providing high quality service in a professional manner recognizing our fiduciary responsibilities to our clients. This Code of Ethics is designed to:

- Protect the firms clients by deterring misconduct;
- Raise employees awareness regarding the firm's expectations;
- Remind employees they are in a position of trust and should act accordingly;
- Guard against violation of the securities laws;
- Establish certain procedures to ensure employees are complying with the firm's ethical guidelines; and
- Protect the reputation of the firm.

Employees are encouraged to remember the following General Principles are applied to all situations whether or not they are specifically stated within this Code of Ethics. Furthermore, failure to comply with the firm's Code of Ethics may result in disciplinary action.

Part 1. General Principles

1. Employees of LPC have a duty to place the interests of clients first.
2. Personal securities transactions are to be conducted in such a manner to be consistent with the Code of Ethics and adhere to federal securities laws, rules and regulations.
3. Investment adviser personnel should not take inappropriate advantage of their positions and knowledge of client information.
4. Client information and financial circumstances is to remain confidential as outlined in LPC's Privacy Policy.
5. LPC is positioned as an independent Registered Investment Advisor allowing the ability to make investment decisions that are in the client's best interest.

Part 2. Scope of the Code.

1. ***Persons Covered.*** The Code of Ethics covers all employees of Lesjak Planning Corporation.
2. ***Securities Covered.*** For the purposes of this Code of Ethics, the definition of “Security” is as follows:
 - a. Security means any stock, bond, future, investment contract or any other instrument that is considered a “security” under the Investment Advisers Act.

Part 3. Standards of Business Conduct.

1. ***Compliance with Laws & Regulations.*** LPC employees are to adhere to federal securities laws, rules, and regulations. Employees, in connection with the purchase or sale of a security for a client, are not permitted:
 - a. To defraud such client in any manner;
 - b. To mislead such client;
 - c. To engage in any manipulative practice with respect to such client; or
 - d. To engage in price manipulation with respect to such securities.
2. ***Conflicts of Interest.*** LPC's duty as a fiduciary to its clients is to act with care, loyalty, honesty, and good faith and in the best interests of its clients. LPC attempts to avoid conflicts of interest and discloses material facts in its filings with the SEC. Employees of LPC are expected to attempt to avoid situations where a conflict of interest may arise.
3. ***Insider Trading.*** It is the policy of LPC that no employee, planner, or officer shall divulge any inside information that they receive on any security.

The Federal securities laws prohibit trading on material, non-public information (inside information) and create potential liability for persons who disclose such information to friends, relatives, etc., as well as for persons who profit from receipt of such information.

If anyone in the firm is in possession of materially undisclosed information concerning a public company, no person in the firm should engage in securities transactions in the securities of such a public company until disclosure is made.

It is our commitment that all of our employees are bound to adhere to all restrictions of insider trading. Violations are considered a very serious offense for which appropriate action will be taken in addition to any criminal or civil sanctions.

4. ***Gifts and Entertainment.*** LPC employees should not accept inappropriate gifts, favors, entertainment, or other things of material value that could influence their decision making or make them feel obligated to a person or a firm. Further, LPC employees should not offer gifts, favors, entertainment or other things of value that could be viewed as overly generous or aimed at influencing decision making or making a client feel obligated to the firm or employee.
5. ***Confidentiality.*** Lesjak Planning Corporation, an independent financial planning firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by Lesjak Planning Corporation. We do not disclose information to nonaffiliated third parties, except as permitted

by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employee access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer).
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

6. *Marketing and Promotional Activities.* Statements made by employees of LPC to clients, prospective clients, other professionals, and the media should be accurate, professional, and not misleading.

Part 4. Personal Securities Trading and Reporting.

- 1. *Personal Trading.*** It is the policy of LPC that personal trading by employees is to adhere to federal securities laws, rules and regulations. Employees are not permitted to engage in securities transactions that intentionally benefit from clients' transactions in the same securities. Violations are considered a very serious offense for which appropriate action will be taken in addition to any criminal or civil sanctions.
- 2. *Monitoring.*** LPC employees' quarterly transaction reports and annual holdings reports are reviewed as to the firm's Compliance Manual.

Part 5. Recordkeeping.

1. A copy of the Code of Ethics is located onsite as well as electronic back up.
2. A record of any violation of the code and actions taken as a result will be located with the Code of Ethics.
3. A record of all written acknowledgements of receipt of the code and amendments for each LPC employee will be located with the Code of Ethics and kept for 5 years after the individual ceases to be with the firm.
4. All other records and reports for the Code of Ethics are located in the Compliance Manual and/or Compliance Reports Binder.

Part 6. Administration and Enforcement.

1. ***Annual Review.*** The Code of Ethics will be reviewed annually for timeliness and accuracy.
2. ***Reporting Violations.*** LPC employees are expected to report violations of the Code of Ethics to the principals and/or Chief Compliance Officer of the firm in a timely manner. Such reports will be treated confidentially to the extent permitted by law.
3. ***Sanctions.*** Violations of the code may result in disciplinary actions deemed appropriate including, but no limited to, a warning, fines, suspension, demotion, or termination of employment in addition to civil or criminal sanctions.