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“Code of Ethics”

DHJJ Financial Advisors has adopted a Code of Ethics (“Code”) which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. The adoption of this Code is required for us to comply with Rule 204A-1 under the Investment Advisers Act of 1940 (“Advisers Act”). This Code establishes rules of conduct for all employees of DHJJ Financial Advisors and is designed to, among other things, govern personal securities trading activities in the accounts of employees. The Code is based upon the principle that we owe a fiduciary duty to our clients to conduct our affairs, including our personal securities transactions, in such a manner as to avoid (i) serving our own personal interests ahead of clients, (ii) taking inappropriate advantage of our positions with the firm, and (iii) any actual or potential conflicts of interest or any abuse of our positions of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by DHJJ Financial Advisors continue to be applied. The purpose of this Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

Pursuant to Section 206 of the Advisers Act, both DHJJ Financial Advisors and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that the firm and its employees have an affirmative duty of utmost good faith to act solely in the best

interest of its clients and to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to plminta@dhjj.com or by calling us at 630.420.1360.

Prohibition Against Insider Trading: Trading securities while in possession of material, non-public information, or improperly communicating that information to others may expose DHJJ Financial Advisors and its employees to stringent penalties. The rules contained in this Code apply to securities trading and information handling by supervised persons of DHJJ Financial Advisors and their immediate family members. With respect to insider trading, the general policy of DHJJ Financial Advisors states that no supervised person may trade, either personally or on behalf of others, while in the possession of material, non-public information, nor may any personnel of DHJJ Financial Advisors communicate material, non-public information to others in violation of the law.

Personal Securities Transactions: At times the interests of the adviser or related persons' accounts may coincide with the interests of clients' accounts; however, at no time will the adviser or any related person receive an added benefit or advantage over clients with respect to these transactions. DHJJ Financial Advisors has adopted the following principles governing personal investment activities by DHJJ Financial Advisors' supervised persons: the interests of client accounts will at all times be placed first; all personal securities transactions of supervised persons will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility; and supervised persons must not take inappropriate advantage of their positions. In addition, no supervised persons shall acquire any beneficial ownership of any securities in an Initial Public Offering ("IPO"), a limited offering, or a private placement offering for his or her personal accounts without the written approval of our firm's Chief Compliance Officer, who must be provided with full details of the proposed transaction.

Every supervised person shall provide initial and annual holdings reports and quarterly transaction reports to our firm's Chief Compliance Officer. The initial holdings report must be provided no later than 10 days after the person becomes a supervised person and must contain a listing of each reportable security (including the number of shares and principal amount) in which the supervised person had any direct or indirect beneficial interest ownership when the person became a supervised person. The annual holdings report must be provided by every supervised person no later than January 30 each year and must contain the same information required in the initial holding report as described above. The information submitted must be current as of a date no more than 45 days before the annual report is submitted. The quarterly transaction reports must be provided by every supervised person no later than 30 days after the end of each calendar quarter and must contain the details of every securities transaction that the supervised person entered into during the quarter in an investment account that the supervised person had any direct or indirect beneficial ownership.

Our firm's Chief Compliance Officer will monitor and review all reports required under the Code for compliance with DHJJ Financial Advisors' policies regarding personal securities transactions and applicable rules and regulations governed by the Securities and Exchange Commission ("SEC").

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may knowingly purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

DHJJ Financial Advisors and individuals associated with our firm are prohibited from engaging in principal transactions.

DHJJ Financial Advisors and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Protecting the Confidentiality of Client Information: As a registered investment adviser, DHJJ Financial Advisors and all supervised persons, must comply with SEC Regulation S-P, which requires investment advisers to adopt policies and procedures to protect the "non-public personal information" of clients. DHJJ Financial Advisors 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 our clients in connection with any of the services provided by DHJJ Financial Advisors. We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted by law.