

MVK's Code of Ethics and Professional Responsibility

To abide by the highest principles and standards, MVK has adopted the Certified Financial Planner Board of Standards' Code of Ethics. The principles set forth below are general statements expressing the ethical and professional ideals MVK will display in all professional activities. In addition to below, all employees of MVK are required to comply with all applicable federal and state securities laws. All employees will receive, and must acknowledge receiving, a copy of MVK's Code of Ethics and any amendments thereto.

Principle 1 – Integrity: Provide professional services with integrity.

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. MVK and its employees are placed in positions of trust by clients, and the ultimate source of that trust is the employee's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity: Provide professional services objectively.

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which MVK functions, MVK and its employees will protect the integrity of the work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence: Maintain the knowledge and skill necessary to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. MVK makes a continuing commitment to learning and professional improvement.

Principle 4 – Fairness: Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.

To ensure fairness in trading, Mark Kleene reviews the personal securities transactions of all access persons on a semi-annual basis. A list of current securities holdings by all access persons is maintained and retained as required under state law.

Principle 5 – Confidentiality: Protect the confidentiality of all client information.

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism: Act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. MVK cooperates with fellow planners and advisers to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence: Provide professional services diligently.

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.