



## **Code of Ethics**

ClearView Financial, LLC, a registered investment advisor, and its investment advisor representative(s) (IAR) have committed to a Code of Ethics. This Code recognizes the firm's fiduciary duty to each client. Its intent is to guard against violations of securities laws and to manage potential conflicts of interest.

### **Principles of Conduct**

1. Act in a professional and ethical manner at all times.
2. Act in the client's best interest.
3. Act with solidarity and objectivity.
4. Uphold the rules governing capital markets, investment advisors and code of conduct.
5. Act with skill, competence and diligence.
6. Communicate with clients in a timely and accurate manner.
7. Adhere to not engaging in unethical practices included in State Corporate Commission (SCC) 21VAC5-80-200.

### **Code of Professional Conduct**

1. Client Loyalty
  - a. Client's interest is placed with priority status.
  - b. Preserve client confidentiality. All information, personal and professional, provided by clients are included in the scope.
  - c. Do not participate in any activity that could affect the objectivity of the advisor or loyalty to the client.
2. Investment Process and Actions
  - a. Use prudent judgment when managing client assets.
  - b. Not engage in activities designed to mislead market participants.
  - c. Provide investment information, recommendations and actions equally with all clients.
  - d. Have a reasonable basis for investment decisions.
  - e. When managing a portfolio with a specific style/strategy:
    - i. Only take actions that are consistent with the stated objectives and constraints of the strategy.
    - ii. Provide disclosures to investors when changes are made to stated investment style and/or strategy.
  - f. Before providing investment advice or taking action on behalf of client the Advisor should understand the client's investment objectives, tolerance for risk, time horizon, liquidity needs, financial constraints, and any other relevant information that would affect the investment policy.
3. Trading
  - a. Not act, or influence others to act, on nonpublic information that could affect the value of a publicly traded investment.



- b. Prioritize investment made on behalf of client over those that would benefit their own interest.
  - c. Seek best execution for all client transactions.
  - d. Establish policies to ensure fair and equitable trade allocation among client accounts.
4. Compliance & Support
- a. Maintain policies and procedures to ensure that their activities comply with all applicable legal and regulatory requirements.
  - b. Appoint a Compliance Officer responsible for administering and maintaining compliance policies and procedures.
  - c. Ensure portfolio information provided to clients is accurate and complete.
  - d. Maintain records as required and in an easily accessible format.
  - e. Establish a Business Continuity Plan to address disaster recovery or periodic disruptions of the financial markets.
5. Performance and Valuation
- a. Represent performance information in a fair, accurate, relevant, timely and complete manner. Do not misrepresent performance.
  - b. Apply fair market prices to value client holdings.
6. Disclosures
- a. Communicate with clients on an ongoing basis.
  - b. Ensure disclosures are concise, truthful and understandable and are presented to the client effectively.
  - c. Include material facts.
  - d. Disclose the following:
    - i. All conflicts of interest with other client accounts, fee structures or outside relationships.
    - ii. Regulatory or disciplinary action taken against the firm or IAR related to professional conduct.
    - iii. Investment process – including any lock-up periods (if applicable), strategies, risk factors (known) and use of leverage.
    - iv. Management fees and investment costs of products used and the methods for determining the fees and costs.
    - v. Performance of client’s investments on a regular and timely basis.
    - vi. Shareholder voting policies.
    - vii. Significant personnel or organizational changes that have occurred at the firm.