



INVESTMENT ADVISER CODE OF ETHICS

Summit Financial Consulting, LLC, (“*Summit Financial*”) takes the issue of regulatory compliance seriously and is committed to maintain compliance with state and applicable federal rules and regulations. Additionally, Summit Financial has a position of public trust and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable. Summit Financial places great value on ethical conduct. Therefore, *the ultimate goal of our internal policies is to challenge our staff to live up not only to the letter of the law, but also to the ideals set forth by Summit Financial.*

You may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Adviser, Summit Financial is a fiduciary to each and every client. As such, Investment Advisors owe their clients several specific duties. According to the United States Securities Commission (“SEC”), to which the State of Michigan defers on this topic, an Investment Adviser’s fiduciary duties include:

- Provide advice that is suitable;
- Provide full disclosure of material facts and potential conflicts of interest (such that the client has complete and honest disclosure in order to make an informed decision about services of Summit Financial and about investment recommendations);
- The utmost and exclusive loyalty and good faith;
- Best execution of transactions;
- Summit Financial’s reasonable care to avoid ever misleading clients;
- Only acting in the best interests of clients.

It is Summit Financial’s policy to protect the interests of each client and to place clients’ interests first and foremost in each and every situation. Summit Financial will abide by honest and ethical business practices to include, but is not limited to:

- ❖ Summit Financial will not induce trading in a client’s account that is excessive in size or frequency in view of the financial resources and character of the account.
- ❖ Summit Financial will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the customer and we will document suitability.
- ❖ Summit Financial and its Advisory Representatives will not borrow money from clients.
- ❖ Summit Financial does not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is

exempt from registration in states where we provide investment advice and based upon information Summit Financial receives.

- ❖ Summit Financial will not recommend that the client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of a broker/dealer that is not licensed, based upon information available to Summit Financial.
- ❖ The staff of Summit Financial will report all but exempt personal securities transactions (such as mutual funds) to Ken Wink, the Chief Compliance Officer of Summit Financial as required by securities rules and regulations. For a list of exempt securities, please contact the Chief Compliance Officer.
- ❖ The staff of Summit Financial is required to report all known or suspected violations of the securities rules and regulations or Summit Financial's written policies and procedures. Such reports are to be made promptly to Summit Financial's Chief Compliance Officer. Failure to report violations may result in internal disciplinary actions to include the possibility of loss of authority or termination and may also result in possible action by regulators (depending upon the nature and severity).

If you should have any questions about how Summit Financial does business or have any concerns during the course of our professional relationship, we want to hear from you.

Thank you,

Kenneth Wink
Chief Compliance Officer
Summit Financial, LLC