

Code Of Ethics

Oh Cap and its Covered Persons pledge to provide high-quality investment guidance, prioritizing the interests of our clients above all else and in full compliance with relevant laws and regulations. This Code covers all aspects of our business and is integral to our corporate governance and compliance program. We are committed to:

- 1. Integrity and Professionalism:** We act with unwavering integrity, competence, and diligence, ensuring that the interests of our clients and the investment profession always take precedence over personal gains.
- 2. Client Centricity:** We prioritize our clients' interests above all, ensuring every decision aligns with their best interests. Our commitment is to place their needs and objectives at the forefront of our operations.
- 3. Independent and Careful Judgment:** We exercise careful, independent judgment in all professional activities, prioritizing the well-being of our clients and the integrity of our analyses and recommendations.
- 4. Client Confidentiality:** We uphold the highest standards of confidentiality regarding all client information. Our duty is to protect client privacy, ensuring that sensitive information is disclosed only in accordance with legal and professional obligations.
- 5. Ethical Communication:** We commit to timely, clear, and respectful communication with all stakeholders, ensuring accuracy and integrity in every message conveyed.
- 6. Market Integrity:** We are dedicated to upholding the rules governing and the integrity of the markets, recognizing our role in contributing to their health and fairness for all participants.
- 7. Competence Development:** We continuously strive to enhance our professional competence, actively contributing to the growth and development of our peers in the investment profession.