



## **Code of Ethics**

### **Quantitative Asset Management**

Quantitative Asset Management's Code of Ethics outlines the conduct that is expected of its personnel as well as the treatment of confidential information used to perform our day to day business. The Firm strives to conduct its business ethically, with integrity and honesty, and in compliance with the laws and regulation imposed under the Investment Advisors Act of 1940.

- We are mindful of the fiduciary aspects of our responsibilities.
- We comply with all laws and guidelines regarding transactions and applicable securities laws.
- We protect the confidentiality of all client information.
- We require the reporting of any perceived violation or improprieties to the Corporate Compliance Officer or President.

The Code of Ethics is made available to all clients, employee and prospects so that it is understood and complied with.

- The Compliance Officer will monitor security portfolios of all employees to ensure they are in compliance with the firms Code of Ethics. Employees will provide the Compliance Officer (or President in the case of the Compliance Officer) with copies of their custodial statements detailing security positions and transactions on a minimum of a quarterly basis.
- Each staff member will receive a copy of the Code of Ethics and any amendments and acknowledge in writing, receipt of same.
- Each staff member will be required to obtain approval before directly or indirectly acquiring beneficial ownership in any security in an initial public offering or in a limited offering.
- Access to client information is limited to a "need to know" basis.
- The Compliance Officer will keep records of:
  - The Code of Ethics, with updates
  - Employee acknowledgements
  - Violations of the Code and responses to violations
  - Holdings and Transaction reports
  - Preclearance of any IPO and private placement transactions by access persons