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Annual Attestations & Acknowledgments

Advisory personnel must maintain a highly professional standard of conduct. To do so, each person must comply with strict prohibitions against any behavior inconsistent with the Adviser's expectations set forth in its policies and procedures manual, and in its Code of Ethics. Advisory personnel must also periodically attest to his or her compliance.

Each applicable associate of Project 7 must read and initial the acknowledgments contained in these attestations as evidence of his or her commitment to the high standard of conduct expected of every affiliate of the Adviser.

Initial Attestation

Code of Ethics Acknowledgment

Every Adviser is required to develop a written Code of Ethics that sets standards of professional conduct for its personnel consistent with the Adviser's fiduciary duties and other applicable law or that address, where applicable, standards of conduct for covered persons, protection of material nonpublic information, requirements to comply with federal securities laws, report personal securities transactions, review of those reports and report violations of the Code of Ethics to a designated person.

Our Firm's Code is based on a few basic principles that should pervade all investment related activities of all employees, personal as well as professional: (1) the interests of Project 7's clients/investors come before Project 7's or any employee's interests; (2) each employee's professional activities and personal investment activities must be consistent with this Code and avoid any actual or potential conflict between the interests of clients/investors and those of Project 7 or the employee; and (3) those activities must be conducted in a way that avoids any abuse of an employee's position of trust with and responsibility to the Adviser and its clients/investors, including taking inappropriate advantage of that position.

I acknowledge my commitment to reading, understanding, and adhering to the Project 7's Code of Ethics.

Policies and Procedures (Compliance Manual) Acknowledgment

Project 7 maintains a compliance manual that contains all the current regulatory policies and procedures as well as Firm procedures designed to monitor, test and achieve compliance with applicable securities laws and regulations.

I, as an employee of Project 7, have received Project 7's compliance manual and have read and understand all of the requirements set forth therein.

Business Continuity Plan (Disaster Recovery) Acknowledgment

All Advisers are required to produce written plans for business continuity and/or to describe the methods in place for controlling risk, and for securing the ongoing operation of their business in the face of an otherwise unanticipated interruption or disaster.

I hereby attest that I have received a copy of Project 7's Business Continuity Plan, that I have read or been trained on the key aspects of the plan and that I understand what the employee's responsibilities are in accordance with the plan in the event of a Significant Business Interruption.

Correspondence and Advertising Attestation

Project 7 is required to review all client correspondence and all advertising material as it is defined in the 1940 Investment Advisers Act as amended. As such I understand it is my responsibility as an associated person of Project 7 to ensure that all correspondence (incoming and outgoing) is presented for review, that only approved means of electronic communications are utilized for business communications and that all advertising material is approved prior to first use.

I hereby attest that all I have submitted all hard copy correspondence (incoming and outgoing) that is to/from a client or to/from a client's representative for review by the compliance department. Further I attest that I only use [person's email@[firm domain].com for business communications and/or have only used the following approved forms of communication when sending a business communication. I also attest that I do not use any form of social media (texting, Twitter, Facebook or LinkedIn etc.) for business communications unless a social media has been approved for use. Lastly I attest that I have not used any unapproved advertising or sales materials and will submit the same prior to first use.

Political Contributions Attestation

Project 7 may have clients that have political affiliations with elected officials. Therefore, Project 7 must track all political contributions of its associated persons in order to ensure a conflict of interest has not arisen that may preclude Project 7 from charging fees to such a client.

As such, I hereby attest that I have reported all political contributions from the past two years to the Chief Compliance Officer and that I will continue to report and obtain approval for all political contributions I am considering prior to them being made.

Compliance Program Acknowledgment

Project 7 has established a compliance program designed to monitor, test and prevent violations of law, regulations and Firm policy.

As a condition of continued employment or association with Project 7, I will abide with all legal, regulatory and Firm policies and adhere to all procedures to assure adherence to those policies. Further, to the extent that I become aware of any violations of law, regulations or Firm policies, I will immediately report said violations to my supervisor or a member of senior management.

Outside Business Activities Attestation

Outside business activities in which you engage may trigger disclosure requirements on the Project 7's regulatory documents, including your own licensing data, which is reported in most jurisdictions on Form U4. Outside activities may raise certain concerns, such as conflicts of interest. For these reasons, you must disclose all outside business activities to Project 7. Following the initial disclosure, updates are required if the activity changes materially, or as otherwise required by Project 7.

I attest that I currently engage only in approved outside business activities and that none of these approved activities have undergone a change during the most recent 12 month period.

(Note: If you have not disclosed an outside activity or there has been a change, please complete and submit an Outside Business Activity Form to Compliance.)

Personal Brokerage Accounts Attestation

An investment adviser's employees or "access persons" are required to periodically report their personal securities transactions and holdings to Project 7. Related persons to the access persons (spouse, dependents in the same household, person's under the employee's direct or indirect control) must also report their accounts. Project 7 is then required to review those reports.

I hereby attest that I have disclosed to Project 7 any and all of my personal and those accounts held by my spouse, dependents in the same household, and other individuals under my direct or indirect control. *(Note: If you have not disclosed a brokerage account, please complete and submit an Outside Brokerage Account Form to Compliance.)*

Electronic Communications

The use of electronic communications, including social media, by investment advisers must comply with the anti-fraud provisions of the securities laws, as well as compliance and recordkeeping provisions. Social media may use many technologies, including, but not limited to, blogs, microblogs, wikis, photos and video sharing, podcasts, social networking, and virtual worlds. An employee's use of electronic communications is subject to Project 7's policies and procedures if used for business purposes rather than, or in addition to, personal purposes.

I hereby attest that I abide by all legal, regulatory and Firm policies related to electronic communications and adhere to all procedures to assure adherence to those policies.

Signing and dating below reaffirms all of the above acknowledgements and attestations. Signing this document is a condition of your continued employment or association.

Signature
Name

Print
Date

☒ I have reviewed the content and accepted the terms.

Submit