

RVK CODE OF CONDUCT AND ETHICS

Guiding Principle

At R.V. Kuhns & Associates, Inc. (RVK), it is essential that all employees conduct business with uncompromising integrity and professionalism. Therefore we shall ensure that our clients receive the highest level of service without a real or perceived conflict of interest.

Contact with Other Financial Intermediaries

The cornerstone of our business philosophy is that we will provide our clients with the highest standard of investment consulting in our industry. We take pride in the fact that we do not have any relationships with investment managers, or other service providers that create conflicts of interest. In keeping with this philosophy RVK employees shall observe the following guidelines:

1. Employees will not accept gratuitous considerations from investment managers, custodians, or any organizations or individuals in investment related fields. This includes meals, gifts, travel, favors, or anything of value that compromises the firm's commitment to conflict-free investment consulting.
2. Employees will not become involved in situations that compromise, or give the appearance of compromising, the firm's or the employee's independence and objectivity.
3. Each of the firm's employees is expected to protect the confidentiality of the client, firm, and third-party information at all times. Employees will be held personally accountable for safeguarding information that is not readily available in the public domain.

Contact with Clients

Providing counsel and assistance to our clients is our responsibility. Our services are directed at helping clients set appropriate goals and objectives so they achieve superior investment results through performance monitoring, investment manager selection, strategic asset allocation, investment policy review and formulation, and portfolio expense monitoring.

To accomplish these goals and objectives, our employees will conduct business by the following principles:

1. Employees who consult and render services to our clients must be completely familiar with and understand the investment goals and objectives of the client. For any of the services we provide, consultants are expected to carefully consider the needs and circumstances of the client before making recommendations. Consultants must always give attention to the appropriateness and suitability of any and all recommendations they make.
2. R.V. Kuhns & Associates, Inc.'s employees shall not make recommendations or give advice about individual securities. Discussions involving securities shall be of a general nature and only to the extent of security classes.
3. Our firm assumes the responsibility for ensuring that standards and general principles are upheld in the analysis of client investment strategies and portfolios. All employees will assist our clients in the following manner:
 - Ensuring that our clients' investment policies and investment allocations are appropriate, meeting their short and long-term objectives.
 - Helping our clients better understand and monitor the results of their investment program.
 - Seeking ways to reduce our client's investment portfolio expenses.
 - Helping improve our client's overall rate of return.

Because we wish to maintain the highest ethical standards in our firm, R. V. Kuhns & Associates, Inc. reserves the right, at any time and under its discretion, to modify any or all of the provisions explained in this Code of Conduct and Ethics, (Code). The standards contained herein are intended to serve only as general information and provide guidelines by which employees conduct business. In no way are these guidelines intended to cover all situations, but rather to provide the framework for understanding the standards we wish to uphold.