

# MULLENNIUM FINANCE LLC

## INVESTMENT ADVISER CODE OF ETHICS

Mullennium Finance LLC, ("*Mullennium Finance*" or "*Adviser*") takes the issue of regulatory compliance seriously and is committed to maintain compliance with state and applicable federal rules and regulations. Additionally, Mullennium Finance 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. Mullennium Finance 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 the Adviser.*

You may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Adviser, Mullennium Finance 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 Utah's Division of Securities defers in this instance, 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 the Adviser and about investment recommendations);
- The utmost and exclusive loyalty and good faith;
- Best execution of transactions;
- The Adviser's reasonable care to avoid ever misleading clients;
- Only acting in the best interests of clients.

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

- ❖ The Adviser 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.
- ❖ The Adviser 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.
- ❖ The Adviser and its Advisory Representatives will not borrow money from clients.
- ❖ We will 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 the Adviser receives.

- ❖ We 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 the Adviser.
- ❖ The staff of the Adviser will report all but exempt personal securities transactions (such as mutual funds, government securities, etc.) to the Chief Compliance Officer of the Adviser as required by securities rules and regulations. For a list of exempt securities, please contact the Adviser.
- ❖ The staff of the Adviser is required to report all known or suspect violations of the State of Utah's Securities Act and/or the anti-fraud provisions of the SEC's Investment Advisors Act of 1940 or the Adviser's written supervisory policies and procedures. Such reports are to be made promptly to the Adviser'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 Mullennium Finance does business or have any concerns during the course of our professional relationship, we want to hear from you.

Thank you,



William T Mullen, CFP®  
Member and Chief Compliance Officer