



FINANCIAL PARTNERS. INC.

Code of Ethics

Policy

The MFP Code of Ethics (the “Code”) sets forth a standard of business conduct required of all employees. The Code mandates honest and ethical conduct at all times.

This Code reflects the Company’s values of impeccable business and personal ethics, respect, teamwork, innovation, and excellence.

Standards of Business Conduct

The Company and its employees recognize their fiduciary obligation to each client. This means that the Company and its employees shall act in the client’s best interest at all times, and the client’s interest shall always be placed ahead of the Company’s interest. Investment opportunities must be offered first to clients before the Company or its employees may act on them. In addition, the Company and its employees are required to act in the best interests of clients regarding execution and other costs paid by clients for brokerage services. All employees are required to follow the Company’s Policies and Procedures Manual regarding brokerage activity, including allocation, best execution, soft dollars and directed brokerage.

The Code of Ethics sets out ideals for ethical conduct premised on the fundamental principles of openness, integrity, honesty and trust. The Company places the highest value on ethical conduct. Employees should live up not only to the letter of the Code, but also to the ideals of the Company.

Employees of the firm shall comply with all applicable federal and state securities laws. The Code is designed to guard against violations of securities laws and to protect the reputation of the Company.

Employees are held personally accountable for learning the Code as well as endorsing, promoting and applying this Code to their own conduct and work.

Employees shall adhere to the compliance policies stipulated in the *Compliance Policies and Procedures Manual*. Employees shall annually review the *Compliance Policies and Procedures Manual* and acknowledge their review in writing.

Chief Compliance Officer

The Company shall appoint a CCO with sufficient authority to enforce the provisions of the Company’s Code of Ethics.

The Company’s CCO is Geoffrey M. Zimmerman.

The Code shall be sufficiently detailed to permit the CCO to determine that employees are complying with the Code.

Access Persons

An “access person” is any director, officer, partner or employee who has access to nonpublic information concerning any sale or purchase of securities, is involved in making securities recommendations to clients that are not yet public, who has access to such recommendations that are nonpublic, or who has access to information regarding investment company clients. Administrative, technical, clerical, and client service representatives may also be access persons if their functions or duties make them privy to nonpublic information.

For all practical purposes, every employee of the Company is considered to be an access person because of the small size of the Company and the open access to all client files, both hardcopy and electronic, for the performance of his/her duties. An access person is presumed to be a beneficial owner of securities not only owned directly, and not only securities owned by others specifically for his or her benefit, but also (i) securities held by his or her spouse, minor children and relatives who live full time in his or her home, and (ii) securities held by another person if by reason of any contract, understanding, relationship, agreement or other arrangement the employee obtains benefits substantially equivalent to ownership.

Conflicts of Interest

The Company and its employees are expected to avoid situations where their personal interests could conflict or appear to conflict with their fiduciary responsibilities to clients.

Employees should avoid any investment, interest, association or other relationship that interferes, might interfere, or might be thought to interfere, with the independent exercise of good judgment. Employees shall not accept any unreasonable gifts from any client, vendor or solicitor or any in violation of our Gift Policy (below). Any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest must be disclosed to the CCO.

To avoid potential or perceived conflicts of interest, employees must alert management if they or a member of their family is an officer of a publicly held company or a sell side broker. No employee may serve as a director of a publicly held company without prior approval by the CCO (or a principal, if the CCO is the proposed board member) based upon a determination that service as a director would not be adverse to the interests of any client/investor.

Client Awareness of the Mosaic Code of Ethics

The Company shall include a brief description of this Code in Part 2 of its Form ADV. Clients shall be provided a copy of this Code upon request at no cost.

Access to Confidential Client Information and Confidentiality

The Company shall restrict access to material nonpublic information about client transactions. Employees shall not misuse client information. Due to the current, small size of the firm, every employee of the Company has access to all client files, both hardcopy and electronic, for the performance of his/her duties.

All information relating to clients/investors' portfolios and activities and to proposed recommendations is strictly confidential. Consideration of a particular purchase or sale for a client/investor is not to be disclosed, except to authorized persons. With client permission, information may be shared with brokers, accountants, attorneys, agents, custodians and fund transfer agents, as necessary, to support the objectives of the client.

Files may not be removed from the office except for meetings with clients outside of the office or for evening preparation immediately before such a meeting. Employees shall safeguard client files while they are temporarily out of the office, including information on portable devices including computers and PDAs.

General Ethical Conduct

The following are potentially compromising situations that must be avoided:

- Causing the Company, acting as principal for its own account or for any account in which the Company or any person associated with the Company (within the meaning of the Investment Company Act) to sell any security to, or purchase any security from, a client/investor in violation of any applicable law, rule or regulation of a governmental agency.
- Communicating any information regarding the Company, its investment products or any client/investor to prospective clients/investors, journalists, or regulatory authorities that is not accurate, untrue or omitting to state a material fact necessary in order to make the statement the Company has made to such person.
- Engaging in any act, practice, or course of business that is fraudulent, deceptive, or manipulative, particularly with respect to a client/investor or prospective client/investor.
- Engaging in any conduct that might appear to be improper.
- Engaging in any financial transaction with any of the Company's vendors, clients/investors or employees, including but not limited to: providing any rebate, directly or indirectly, to any person or entity that has received compensation from the Company; accepting, directly or indirectly, from any person or entity, other than the Company, compensation of any nature such as a bonus, commission, fee, gratuity or other consideration in connection with any transaction on behalf of the Company; beneficially owning any security of, or have, directly or indirectly, any financial interest in, any other organization engaged in securities, financial or related business, except for beneficial ownership of not more than one percent of the outstanding securities of any business that is publicly owned.
- Engaging in any form of harassment.
- Improperly using or authorizing the use of any inventions, programs, technology or knowledge that are the proprietary information of the Company.

- Investing or holding outside interest or directorship in clients/investors, vendors, customers or competing companies, including financial speculations, where such investment or directorship might influence in any manner a decision or course of action of the Company. In the limited instances in which service as a director is authorized by the Company, employees serving as directors will be isolated from other employees who are involved in making decisions as to the securities of that company through procedures determined by the Company to be appropriate according to the circumstances.
- Making any untrue statement of a material fact or omitting to state to any person a material fact necessary in order to make the statements the Company has made to such person materially complete.
- Making any unlawful agreement with vendors, existing or potential investment targets or other organizations.
- Participation in civic or professional organizations that might involve divulging confidential information of the Company.
- Unlawfully discussing trading practices, pricing, clients/investors, research, strategies, processes or markets with competing companies or their employees.
- Using any device, scheme or artifice to defraud, or engaging in any act, practice, or course of conduct that operates or would operate as a fraud or deceit upon, any client/investor or prospective client/investor or any party to any securities transaction in which the Company or any of its clients/investors is a participant.

Misappropriation of Customer Funds

Misappropriation, stealing, or conversion of customer funds is prohibited and constitutes serious fraudulent and criminal acts. Examples of such acts include (a) unauthorized wire or other transfers in and out of customer accounts, (b) borrowing customer funds, (c) converting customer checks that are intended to be added or debited to existing accounts, and (4) taking liquidation values of securities belonging to customers. Such actions by MFP employees shall subject them to immediate termination and possible criminal prosecution.

Holdings Reports

Each access person shall provide to the CCO a complete report of his/her securities holdings within 10 days of becoming an access person. Brokerage statements may be used as the basis of the report as long as the statement is current as of a date no more than 45 days prior to the date the person became an access person. In addition, each employee shall provide annually (within 30 days of calendar year end) a report of his/her holdings dated December 31st of such calendar year. Said report shall include a completed Initial and Annual Holdings Report form and brokerage and account statements or the equivalent.

The CCO shall review, sign and date the holdings reports submitted by access persons. MFP's President, or his designee, shall review, sign and date the holdings report of the CCO. These reports shall be electronically stored in WD.

Transaction Reports

Under Rule 204A-1, access persons must submit transaction reports for "reportable securities" in which the access person has, or acquires, any direct or indirect beneficial ownership. Such reports shall include the Quarterly Securities Transaction Report and brokerage and account statements, including transaction information for the quarter, if there were trades of reportable securities.

Transaction reports must be submitted no later than 30 days after the end of each calendar quarter for all security holdings to the CCO. Duplicate confirmations, SPT's Buys and Sells Report, and/or account statements may be used as part of the reporting requirement. However, transactions of "reportable securities" during that period must be highlighted or stated separately. Transaction reports are to be accompanied by an affirmation that these transactions represent all such transactions during that period.

Rule 204A-1 does not require a report be filed to confirm the absence of transactions in a quarter where no trades were affected. However, the Company requires that a report (Quarterly Securities Transaction Report) be filed each quarter by all access persons regardless of activity so that the Company will avoid missing any reports inadvertently.

Transaction reports may take the form of monthly statements or statements generated by SPT, but shall contain the following information, as a minimum, about each transaction involving a reportable security in which the access person had, or as a result of the transaction acquired, any direct or indirect beneficial ownership:

- The date of the transaction, title, and as applicable the exchange ticker symbol or CUSIP, interest rate and maturity date, number of shares, and principal amount of each reportable security involved;
- The nature of the transaction (i.e., purchase, or sale or any other type of acquisition or disposition);
- The price of the security at which the transaction was effected;
- The name of any broker, dealer, or bank with or through which the transaction was effected; and
- The date the access person submits the report.

Reportable Securities

The CCO shall review, sign and date the reports. MFP's President, or his designee, shall review, sign and date the holdings report of the CCO. These quarterly transaction reports shall be electronically

stored in WD. The log of employee name and date received is found in WD Compliance/Compliance/Compliance Logs.

Most securities in which an access person has, or acquires, any direct or indirect beneficial ownership are “reportable securities.” The following securities are not considered “reportable securities”:

- Direct obligations of the Government of the United States;
- Money market instruments (bankers’ acceptances, bank CDs, commercial paper, repurchase agreements and other high quality short-term debt instruments);
- Shares of money market funds;
- Shares of any mutual fund, unless the Company or a control affiliate acts as the investment Company or principal underwriter for the fund; and
- Transactions in units of a unit investment trust if the unit investment trust is invested exclusively in unaffiliated mutual funds.

It should be explicitly noted that as of this time, ownership of or transactions involving Exchange Traded Funds must be reported upon.

Personal securities reporting are not required when:

- Transactions are effected pursuant to an automatic investment plan; and/or
- Securities are held in accounts over which the access person has no direct or indirect influence or control.

Employee Investment Activities

Custody of accounts:

- Employees are strongly encouraged (but not required) to custody personal investment accounts at one of MFP’s preferred custodians.

Investment Activities:

- MFP Employees are encouraged to follow the MFP investment approach for their own investment holdings. Ideally, employees will adopt a standard MFP asset allocation model, implement the model using securities from the MFP recommended list, and use the software resources in use by MFP to monitor and rebalance the portfolio.
- Employees who wish to customize their asset allocation or funds used may do so without prior approval, provided they are generally following MFP’s 10 investment principles. Those

who deviate in a material fashion should submit a written explanation to the President and CCO for approval.

- This policy does not apply to spouses or family members who manage their own personal accounts. However, in these cases, quarterly and annual securities holdings and transaction reporting do still apply.

Restricted Lists

The Company shall maintain a list of issuers of securities about which the Company has inside information. Access persons are prohibited from trading personally or trading for clients in securities of any such issuers.

MFP has restricted trading in the companies of those clients who are Officers of Public Companies. That list is found in WD at Compliance/Unrestricted Compliance/Logs and is titled Officers of Public Companies.

Transactions in securities may be restricted in situations other than the above, and any such restrictions are noted on the Restricted List.

Blackout Periods

MFP makes every effort to avoid the possibility of defrauding a client. At any time in which trading ahead of a client or allocating a trade in a particular manner that may result in defrauding a client, MFP shall establish a blackout period or prohibit such personal trades.

No access person may purchase or sell any non-exempt security for any Covered Account (account he or she controls) without first obtaining prior approval from the CCO. In the case of the CCO's own personal request to purchase or sell a non-exempt security, the President shall render prior approval. For purposes of this Policy, the term "exempt securities" means:

- Securities that are direct obligations of the Government of the United States,
- money market instruments (bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments),
- money market funds,
- mutual funds (unless the adviser or a control affiliate acts as the investment adviser or principal underwriter for the fund),
- Exchanged Traded Funds (ETFs),
- unit investment trusts invested exclusively in open-ended mutual funds (unless the adviser or a control affiliate acts as the investment adviser or principal underwriter for any of the funds), and

- Securities traded in accounts over which an employee does not exercise any investment discretion.

It is the covered person's obligation to ensure that pre-clearance requests are provided to the CCO. The CCO may take any and all steps he or she deems appropriate in rendering or denying approval for the proposed trade. In the event that the CCO is not accessible, all pre-clearance requests will be forwarded directly to the President. NO action may be taken (i.e., no trade may be made) until approval is attained. Pre-clearance authorization for a transaction is only valid for the day on which the approval is granted. If the transaction is not completed that day, the covered person must have the proposed transaction approved again. This requirement applies to transactions involving open market orders and limit or other types of orders.

No employee may purchase and subsequently sell a security within any thirty (30) day period, unless such transaction is approved in writing by the CCO (wash sales). Each determination will be made on a case by case basis. The CCO shall have the sole authority to grant or withhold permission to execute the trade.

No MFP employee may purchase new publicly offered issues of any securities ("New Issue Securities") or may purchase securities of a limited offering for any Covered Account in the public offering of those securities without the prior written consent of the CCO.

Insider Trading

To detect and prevent the misuse of material, nonpublic information by employees, the Company has adopted the following policies and procedures:

The Company forbids any officer, director or employee from trading, either personally or on behalf of others, on material nonpublic information or communicating material nonpublic information to others in violation of the law. This conduct is frequently referred to as "insider trading." The Company's policy applies to every officer, director and employee and extends to activities within and outside their duties at the Company. Each officer, director and employee must read this policy statement and acknowledge his or her understanding of it. Any questions regarding the Company's policy and procedures should be referred to the CCO.

The term "insider trading" is not defined in the federal securities laws, but generally is used to refer to the use of material nonpublic information to trade in securities (whether or not one is an "insider") or to communications of material nonpublic information to others.

While the law concerning insider trading is not static, it is generally understood that the law prohibits the following:

- Trading by an insider while in possession of material nonpublic information
- Trading by a non-insider, while in possession of material nonpublic information, where the information either was disclosed to the non-insider in violation of an insider's duty to keep it confidential or was misappropriated

- Communicating material nonpublic information to others in violation of one's duty to keep such information confidential

Who Is An Insider?

The concept of an "insider" is broad. It includes officers, directors and employees of a company. In addition, a person can be a "temporary insider" if he or she enters into a special confidential relationship in the conduct of a company's affairs and as a result is given access to information solely for the company's purposes. A temporary insider can include certain "outsiders" such as, among others, a company's attorneys, accountants, consultants, bank lending officers, and the employees of such organizations. According to the United States Supreme Court, before such an "outsider" may be considered a "temporary insider", the company's relationship with the outsider must be such that the company reasonably expects him or her to keep the disclosed nonpublic information confidential. Since several of our clients are officers of public companies, our employees need to exercise caution as regards information they may learn from such a client.

What Is Material Information?

While access persons are prohibited from trading on inside information, trading on inside information is not a basis for liability unless the information is "material." Information generally is material if there is a substantial likelihood that a reasonable client/investor would consider it important in making his or her investment decisions, or if public dissemination of the information is reasonably certain to have a substantial effect on the price of a company's securities. Information that should be presumed to be material includes, but is not limited to: dividend changes; earnings estimates; changes in previously released earnings estimates; significant merger or acquisition proposals or agreements; commencement of, or developments in, major litigation; liquidation problems; and extraordinary management developments.

Caution must be exercised however, because material information does not necessarily have to relate to a company's business. The Supreme Court of the United States has broadly interpreted materiality in some cases, and has asserted criminal liability associated with inappropriate disclosures. The SEC considers the term "material nonpublic information" to apply not only to issuers, but also to the adviser's client securities holdings and transactions.

What Is Nonpublic Information?

Information is nonpublic until it has been effectively communicated to the market place. One must be able to point to some fact to show that the information is generally public. For example, information found in a report filed with the Securities and Exchange Commission, or appearing in Dow Jones, Reuters Economic Services, The Wall Street Journal or other publications of general circulation would be considered public.

Types of Liability

Actions by the US courts, including the Supreme Court, have resulted in findings that assert liability to fiduciaries in the context of trading on material nonpublic information. In some cases it has been found that a non-insider can enter into a confidential relationship with the company through which

they gain information or they can acquire a fiduciary duty to the company's shareholders as "tippees" if they are aware, or should have been aware, that they have been given confidential information by an insider who has violated his fiduciary duty to the company's shareholders. This is a circumstance into which an associate of the Company may fall.

In the "tippee" situation, a breach of duty occurs only if the insider personally benefits, directly or indirectly, from the disclosure. It is important to note that the benefit does not have to be monetary; it can be a gift and can even be a 'reputational' benefit that will translate into future earnings.

Another basis for insider trading liability is the "misappropriation" theory, where trading occurs on material nonpublic information that was stolen or misappropriated from any other person. This theory can be used to apply liability to individuals not previously thought to be encompassed under the fiduciary duty theory.

Penalties for Insider Trading

Penalties for trading on or communicating material nonpublic information are severe, both for individuals involved in the trading (or tipping) and their employers. A person can be subject to some or all of the penalties below even if he or she does not personally benefit from the violation.

Penalties may include:

- Civil injunctions;
- Damages in a civil suit as much as three times the amount of actual damages suffered by other buyers or sellers;
- Disgorgement of profits;
- Jail sentences;
- Fines for the person who committed the violation of up to three times the profit gained or loss avoided, whether or not the person actually benefited;
- Fines for the employer or other controlling person of up to the greater of \$1,000,000 or three times the amount of the profit gained or loss avoided;
- Prohibition from employment in the securities industry; and/or
- In addition, any violation of this policy statement can be expected to result in serious disciplinary measures by the Company, including dismissal of the persons involved.

Gift Policy

The receipt or giving of any gift/entertainment of more than nominal value (\$500/year) by an employee or his/her immediate family from any entity that does business with or on behalf of any

client/investor is prohibited, except as otherwise permitted in writing by the CCO. Gifts of all value in excess of \$100 are subject to disclosure requirements and are kept in a gift log (WD Compliance/Unrestricted Compliance/Logs).

For purposes of the policy on the receipt or giving of gifts, a gift of nominal value shall be determined as cash, cash equivalent, physical item, and service or event tickets with a value not to exceed \$500.00.

Service as a Director

No employee may serve as a director of a publicly-held company without prior approval by the CCO (or a senior principal, if the CCO is the proposed board member) based upon a determination that service as a director would not be adverse to the interests of any client/investor. In the limited instances in which such service is authorized, employees serving as directors will be isolated from other employees who are involved in making decisions as to the securities of that company through procedures determined by the CCO to be appropriate in the circumstances. These practices may also constitute illegal “insider trading.” Some of the specific trading rules described below are also intended, in part, to prevent front running and scalping. If an account is managed by an investment adviser, other than the Adviser, to which full investment discretion has been granted, these rules will not apply for so long as the employee(s) who has (have) a beneficial ownership interest in the account do not have or exercise any discretion. Such accounts will remain subject to the reporting requirements set forth in the next section of this Code.

Duties of Confidentiality

All information relating to clients/investors’ portfolios and activities and to proposed recommendations is strictly confidential. Consideration of a particular purchase or sale for a client/investor account may not be disclosed, except to authorized persons.

Enforcement

The CCO shall maintain and enforce this Code of Ethics, including reviewing the securities holdings and transaction reports of access persons to identify improper trades or patterns of trading that would suggest violations of this Code or potential front running, market timing, scalping, short swinging or other such practices. Implementation shall be in accordance with the *Compliance Policies and Procedures Manual*.

The CCO shall take into account any changes in the business of the Company or the scope of that business, the nature of the Company’s clients, the nature of the investment activities of the Company, and the developments in the investment industry and securities markets.

The CCO and management shall review and update the Code of Ethics periodically and at least annually.

Reporting of Violations

Any employee of the Company who becomes aware of actual or potential violations of this Code of Ethics or who has concerns regarding questionable matters involving the Company or an employee should contact the CCO immediately.

The Company shall affirmatively act to foster an environment supportive of regulatory compliance. Employees shall not be subject to recrimination for the reporting of actual or potential violations of the Code of Ethics.

Consequences of Violations

Any violation of this Code may result in disciplinary action including, but not limited to, the following:

- Disciplinary action (up to and including suspension or termination of employment);
- Cancellation of trades, disgorgement of profits and/or selling positions at a loss;
- Pursuit of any and all remedies available to the Company for any damages or harm resulting to the Company from a violation, including injunctive relief; and
- Referral of matters to appropriate legal or regulatory authorities for investigation and prosecution.

Directing or pressuring others to violate a provision of this Code, failure to properly report Code violations, or retaliation against an employee for reporting a concern or violation with respect to this Code will also result in disciplinary action.

Training

The Company shall include in its new employee orientation a training session to apprise such employees of the Code of Ethics and to inform them of their obligations under the Code. The Company shall hold an annual employee meeting to reaffirm the provisions of the Code of Ethics.

The CCO shall ensure that the Code of Ethics (and any amendments) is provided in writing to each employee annually. Annually, each access person must certify that he or she has read and understands this Code of Ethics, that he or she recognizes that this Code applies to him or her, and that he or she has complied with all the rules and requirements of this Code that apply to him or her. The Code of Ethics Acknowledgment is to be signed by each access person and kept in the compliance file in WD.

Recordkeeping and Disclosure

The company shall maintain copies of its Code of Ethics and any amendments thereto for a period of five years after the last date it was in effect.

The Company shall maintain a record of the names of all access persons, which must include every person who was an access person at any time within the past five years, even if some are no longer access persons or have terminated employment.

The Company shall maintain copies of each access person's written acknowledgment of the annual receipt of the Code of Ethics for five years after the person ceases to be an access person.

The Company shall maintain records showing the holdings made by access persons, and evidence of the review of these holdings.

The Company shall maintain records showing the transactions made by access persons, and evidence of the review of these transactions.

The Company shall maintain records of decisions approving an access person's acquisition of securities in IPOs and private placements.

The Company shall maintain records of violations of the Code of Ethics and actions taken as a result of the violations.

Additional Codes of Ethics to Which Employees are Subject

The Company and its employees abide by the Code of Ethics and Professional Responsibility stipulated by the Certified Financial Planner Board of Standards, which is incorporated herein by reference. In addition, the Company has adopted the CFP Practice Standards stipulated by the Certified Financial Planner Board of Standards.

The Company and its employees abide by the CFA Institute (formerly, the Association for Investment Management and Research [AIMR]) Code of Ethics and Professional Responsibility, which is incorporated herein by reference.

Responsibility

The CCO has the primary responsibility for the implementation and monitoring of the firm's Code of Ethics and Insider Trading policies, practices and recordkeeping for the firm.

Procedure

In addition to the procedures detailed above in the Code of Ethics, MFP has adopted the following procedures:

- Each MFP employee is required to complete and sign a quarterly compliance attestation.
- Employees must report to the CCO all business, financial or personal relationships that may result in access to material, non-public information. Records of such relationships are maintained in WD Compliance/Compliance/Various Signed Agreements.
- The Director of Investments or the CCO shall provide guidance to employees on any possible insider trading situation or question.

- The CCO shall prepare a written report to management and/or legal counsel upon the occurrence of any possible violation of the firm's Code of Ethics and management shall implement corrective and/or disciplinary action as appropriate.

To prevent the misappropriation, stealing or conversion of customer funds, the Adviser will implement one or more of the following procedures:

- Verify changes of address with the customer by requesting such changes in writing from the customer or by verifying the change through a telephone call or email to the customer.
- Require supervisory review of changes of address or customer account information to ensure that employees do not independently change customers' addresses and account information.
- Ensure associated persons do not have the ability to alter account statements on-line.
- Closely analyze customers' use of any address other than their home address. Use of P.O. boxes, "in care of" addresses, and other than home addresses are prohibited, unless verified by telephone and in writing directly with the customer by a supervisor or firm compliance employee. Duplicate confirmations and account statements are sent to the customer's home address, whenever possible.
- All transfers, withdrawals, or wires from the customer's account require the customer's written authorization and must receive supervisory approval.
- Periodically and systematically review (through the use of exception reports or other means) for indications of problems, such as: (1) number of customers with non-home mailing addresses; (2) any customer account that shows the same address as an associated person; (3) multiple changes of address by a customer or among customers of an associated person; (4) use of the same address for multiple customers; and (5) correspondence returned as undeliverable by the post office. The CCO or designee will contact the associated person and/or the customer directly to follow up on and investigate unusual activity.
- If possible, provide customers with access to their account statements on a secure firm website so that customers can easily verify activity in their accounts.
- The use of personal electronic devices (personal computers, PDA's) to conduct firm business is prohibited unless the use of personal electronic devices is pre-approved and the devices can be linked with the firm's system to allow for supervisory review.
- Require each associated person who has knowledge of misappropriation, stealing or conversion of customer funds to promptly report the situation to the CCO.