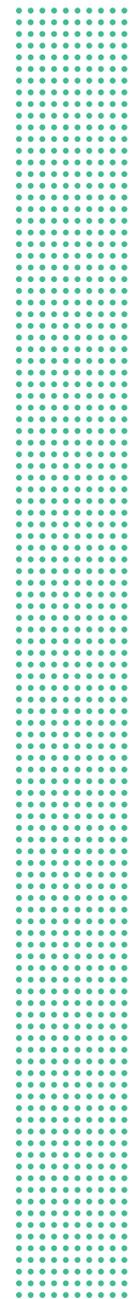




Code of Conduct



Smartvestor Pro Code Of Conduct:



The SmartVestor Pro Code of Conduct (“Code”) sets forth the general expected conduct and general personal finance philosophy of SmartVestor Pro (“Pro”) as affirmed to Ramsey Solutions during Pro’s application to advertise through the SmartVestor program. Execution and assent to this Code is a requirement and an ongoing condition for advertising in the SmartVestor program. This Code is in no way intended to compromise the Pro’s professional judgment or modify any legal, regulatory or professional obligations the Pro owes to any individual client. Moreover, neither this Code nor any other aspect of SmartVestor advertising shall dictate, mandate or prohibit any particular product or service offered or provided by Pro to any particular client whatsoever. Therefore, by signing below, the Pro assents the following:

- Pro will not engage in unlawful, illegal, or unethical conduct, especially such conduct involving dishonesty, fraud, deceit, misrepresentation, which reflects adversely on Pro’s trustworthiness, professional competence, and fitness as a SmartVestor Pro.
- Pro consents to initial and ongoing screening by Ramsey Solutions of the following:
 - FINRA Broker Check, including any criminal history or bankruptcy information.
 - A complete computer-search of all public media accounts that may reference Pro.
 - Checks of any published sex offender registry.
- Pro affirms that neither Pro nor Pro’s firm nor closely held business is currently seeking federal or state bankruptcy protection. If Pro has sought bankruptcy protection in the past, Pro affirms that its most recent bankruptcy filing has been discharged or dismissed at least two years prior to the SmartVestor Pro relationship.
- Pro is not currently subject to any tax liens and is not unlawfully evading or delinquent with respect to any federal, state or local taxes.
- Pro affirms that eliminating debt and investing for the long-term is the ideal way to build wealth and prepare for retirement.
- In the usual case, Pro recommends that clients have a reasonable emergency fund or savings before they start investing in non-liquid investments.
- Pro commits to prompt and responsive client service. Pro aspires to and exercises best efforts to contact new and current clients quickly, within 24 hours or as soon as practicable under the circumstances.

(Continued)

Smartvestor Pro Code Of Conduct:



- Pro is not subject to any mandatory policies preventing Pro from working with all types of clients, regardless of account size, preferences, or background.
- Pro is familiar and generally agrees with Ramsey Solutions' mission and personal finance principles of its products and services.
- Pro has operational capacity to serve and promptly respond to all existing clients and the increased volume that could potentially result from advertising with SmartVestor.
- Pro does not exclusively offer proprietary products. With respect to its clients, Pro does not promote proprietary products over other offerings (1) solely because of a firm policy or fee or commission arrangement in such proprietary products, or (2) when in Pro's reasonable professional judgment, the proprietary products would not achieve the client's goals.
- Pro affirms that considering potential market returns, premiums, and costs to the client, whole life or cash value life insurance is not a prudent use of most clients' funds.
- Pro believes that long term financial success is significantly dependent upon a client's understanding of the market, risks, taxes, investment options, goals, strategies and other factors effecting the outcome of a client's wealth building plan. Therefore, in his or her interactions with clients, Pro actively endeavors to help clients become knowledgeable and educated concerning the client's personal finances, investments, and overall financial plan.

