



Code of Ethics

Under the Investment Advisors Act, financial advisors are considered fiduciaries with the responsibility of acting in the best interests of their clients. In addition, financial advisors who have qualified plan clients may be also subject to ERISA which requires that they act according to the prudent man rule, i.e. with the care, skill, prudence, and diligence that a prudent person acting in a like capacity would use in the same circumstance.

In recognition of these legal requirements, and because RWA believes that it serves the long term, best interests of its clients, the company, and its financial advisors to uphold high standards of business conduct, RWA adopts the following ideals for its Code of Ethics. RWA and its financial advisors shall pledge to seek always:

- to place the best interests of their clients before their own interests;
- to serve clients fairly, diligently, and with integrity;
- to provide objective and suitable advice, including, but not limited to, suitable advice regarding any replacements of financial or insurance products;
- to maintain the professional knowledge, skills, and competence needed in order to give clients the best possible advice;
- to hold in confidence any protected client information, disclosing only when legally required to do, when defending against charges of wrongdoing, or after receiving authorization for such disclosure;
- to abide by and conform to all laws and regulations in the jurisdictions in which they do business;
- to maintain conduct which will reflect favorably upon advisors' professions; and
- to disclose the facts needed by clients to make informed decisions, including any conflicts of interests relating to the services provided.