

Dodds Wealth Management Group
Code of Ethics
As of November 19, 2014

Dodds Wealth Management Group (the “Company”) has established, maintains, and enforces the following Code of Ethics. We not only make a copy available to our clients and prospective clients upon request, but we also provide each of our supervised persons with a current copy and require them to read and agree to comply with its provisions. Any questions about this Code should be directed to the Company’s Chief Compliance Officer (“CCO”).

Adoption of CFP Board’s Code of Ethics and Professional Responsibility

The Company has adopted the Code of Ethics and Professional Responsibility of the Board of Certified Financial Planners (attached), for all of its supervised persons. All supervised persons will be required to abide by those standards required of CFP certificate holders and members. Generally, supervised persons will be required to:

- Provide professional services with integrity.
- Provide professional services objectively.
- Maintain the knowledge and skill necessary to provide professional services competently.
- Be fair and reasonable in all professional relationships.
- Disclose conflicts of interest.
- Protect the confidentiality of all client information.
- Act in a manner that demonstrates exemplary professional conduct.
- Provide professional services diligently.

Additional Company Policies

In addition to being required to abide by the adopted CFP Board Code of Ethics and Professional Responsibilities, all supervised persons are also required by the Company to:

- Comply with applicable federal and state securities laws;
- Comply with applicable provisions of the Company’s Compliance and Supervisory Manual;
- Comply with the Company’s insider trading policy:
 - Comply with all securities laws regarding insider trading
 - Refrain from trading, either personally or on behalf of others, using any inside information or material non-public information, or trading using any information falsely represented as inside information or non-public information (including

pending orders or research recommendations, corporate finance activities, mergers and acquisitions, advanced earnings information, client securities holdings and transactions, and other material non –public information that could affect the price of a security).

- Refrain from disclosing non-public information and take appropriate steps to protect such information from others
- Refrain from spreading any securities or client related rumors or misinformation that the employee knows to be false or misleading which might reasonably be expected to affect market conditions or the price of a particular security.
- Contact the Company’s CCO with any questions about potentially prohibited activities
- Comply with the Company’s Privacy Policy and further maintain confidentiality of all information that the employee receives through his or her association with the Company except to the extent required to carry out his or her Company duties.
- Obtain written pre-approval before participating in any investment or outside business activity as an employee, owner, director, investor, or any similar role, and report any immediate family member participating in any investment activity.
- Disclose any other potential conflict of interest to the CCO for review.
- Comply with the following Company personal trading policies:
 - Report to the CCO for review all holdings (annually), new accounts opened (quarterly) and transactions (quarterly) of reportable personal securities (excludes non-client mutual funds and government securities) as required by securities laws;
 - Obtain written pre-approval from the CCO before directly or indirectly obtaining beneficial ownership in any security in an initial public offering or in a limited offering;
- Promptly report violations of securities laws, of the Company Compliance and Supervisory Manual, or of the Company Code of Ethics, to the Chief Compliance Officer or if necessary, another member of the Company’s ownership.
- Promptly report gifts or compensation of over \$100 in value from outside sources to the Chief Compliance Officer.

Dodds Wealth Management Group
Code of Ethics
As of October 19, 2014

ANNUAL CODE OF ETHICS ACKNOWLEDGEMENT AND CERTIFICATION

I acknowledge that I have read the Code of Ethics of Dodds Wealth Management Group (a copy of which has been supplied to me that I will retain for future reference) and agree to comply in all respects with the terms and provisions thereof. I have disclosed or reported all personal securities transactions, holdings and accounts required to be disclosed or reported by this Code of Ethics and have complied with all provisions of this Code.

I understand that violating securities laws could result in civil and criminal liability, and that violating the Code of Ethics could result in additional sanctions including termination.

Print Name and Title

Signature

Date

Dodds Wealth Management Group

Code of Ethics (Attachment)

CFP Code of Ethics and Professional Responsibility

The CFP Board adopted the *Code of Ethics* to establish the highest principles and standards. These Principles are general statements expressing the ethical and professional ideals certificants and registrants are expected to display in their professional activities. As such, the Principles are aspirational in character and provide a source of guidance for certificants and registrants. The Principles form the basis of CFP Board's *Rules of Conduct*, *Practice Standards* and *Disciplinary Rules*, and these documents together reflect CFP Board's recognition of certificants' and registrants' responsibilities to the public, clients, colleagues and employers.

Principle 1 – Integrity: Provide professional services with integrity.

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Certificants are placed in positions of trust by clients, and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity: Provide professional services objectively.

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence: Maintain the knowledge and skill necessary to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Certificants make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness: Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.

Principle 5 – Confidentiality: Protect the confidentiality of all client information.

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism: Act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. Certificants cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence: Provide professional services diligently.

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.