

## Code of Ethics Statement

### Background

In accordance with Michigan regulations, Fineberg Wealth Management, LLC has adopted a code of ethics to:

- Set forth standards of conduct expected of advisory personnel (including compliance with federal securities laws);
- Safeguard material non-public information about client transactions; and
- Require “access persons” to report their personal securities transactions. In addition, the activities of an investment advisor and its personnel must comply with the broad antifraud provisions of Section 206 of the Advisers Act.

### Firm Statement

As an investment advisor firm, we have an overarching fiduciary duty to our clients. They deserve our undivided loyalty and effort, and their interests come first. We have an obligation to uphold that fiduciary duty and see that our personnel do not take inappropriate advantage of their positions and the access to information that comes with their positions.

Fineberg Wealth Management holds their directors, officers, and employees accountable for adhering to and advocating the following general standards to the best of their knowledge and ability:

- Always place the interest of the clients first and never benefit at the expense of advisory clients;
- Always act in an honest and ethical manner, including in connection with, and the handling and avoidance of, actual or potential conflicts of interest between personal and professional relationships;
- Always maintain the confidentiality of information concerning the identity of security holdings and financial circumstances of clients;
- Fully comply with all applicable laws, rules and regulations of federal, state and local governments and other applicable regulatory agencies; and
- Proactively promote ethical and honest behavior with Fineberg Wealth Management including, without limitation, the prompt reporting of violations of, and being accountable for adherence to, this Code of Ethics.

## Fiduciary Statement

### Background

An investment advisor, whether registered or not, has an affirmative duty to act in the best interests of its clients and to make full and fair disclosure of all material facts to the exclusion of any contrary interest. Generally, facts are “material” if a reasonable investor would consider them to be important. The duty of addressing and disclosing conflicts of interest is an ongoing process and as the nature of an advisor's business changes, so does the relationship with its clients.

### Firm Statement

As a registered investment advisor, Fineberg Wealth Management, LLC owes its clients specific duties as a fiduciary:

- Provide advice that is suitable for the client;
- Give full disclosure of all material facts and any potential conflicts of interest to clients and prospective clients;
- Serve with loyalty and in utmost good faith;
- Exercise reasonable care to avoid misleading a client; and
- Make all efforts to ensure best execution of transactions.

Fineberg Wealth Management seeks to protect the interest of each client and to consistently place the client’s interests first and foremost in all situations. It is the belief of this investment advisor that its policies and procedures are sufficient to prevent and detect any violations of regulatory requirements as well as the firm’s own policies and procedures.