



Atlas Capital Management

## CODE OF ETHICS

This Code of Ethics applies to all employees of Atlas Capital Management Corp. (ATLAS). Employees shall maintain the highest standards of professional conduct in their daily business representing ATLAS to the general public or fellow employees in the office, in the field or in any communications or correspondence. Employees shall comply with the laws and regulations of the United States and the state and local governments' jurisdiction over ATLAS's business activities. This includes all laws preventing the use of non-public information by any associated person. Employees shall also adhere to the regulations of all national and regional stock exchanges, the National Association of Securities Dealers and other self-regulatory entities.

Employees shall not make statements that the employee knows or has reason to believe are inaccurate or misleading. If any publication attributes statements to an employee which the employee did not make, and if such published statements can be expected to inform the publication promptly of its error. Employees shall in particular, avoid leading anyone to believe that views of future market price behavior reflect fore-knowledge rather than estimates and projections subject to re-examination and, as circumstances may dictate, to change.

Employees shall not accept compensation or gifts (other than those normally extended as a matter of business courtesy) if the acceptance of such compensation or gifts could be construed as being specifically intended as a special inducement or reward for taking a particular action in the financial markets on behalf of the employees or the employees' clients. All representatives of ATLAS asset management shall provide within 10 calendar days of the end of each calendar quarter, a complete statement of holdings and transactions for all accounts in which the associated person has a financial interest, or control over. Furthermore, each account must state the name of the firm through which the transactions were effected.

When an employee comes to the conclusion or becomes aware that ATLAS has come to the conclusion that security should be bought or sold for a client or clients, the employee and the employees' immediate family shall not act on such conclusion before action is taken on behalf of ATLAS's clients. For the purchase, sale, or exchange of the shares of open-end mutual funds or Exchange Trades Funds (ETF's) it is permissible for the share of employee's accounts to be transacted at the same time as clients.

Employees shall offer undivided fidelity and loyalty to the legitimate interest of ATLAS and ATLAS's clients. Employees shall keep in complete confidence knowledge concerning the private affairs of ATLAS's clients and information contained in ATLAS's client records unless compelled to disclose such information by applicable law. Employees shall make every effort to maintain the highest degree of accuracy in all client records.

When presenting or discussing ATLAS's investment performance, employees shall make every effort not to "sell" performance. Employees shall present information about investment performance only in compliance with applicable laws and regulations. Performance shall not be presented in a manner that may lead anyone to believe that past performance is an indication of future performance or risk.

I have read the above "Code of Ethics" and agree to abide by said "Code of Ethics" during my employment by Atlas Capital Management Corp.

Employee \_\_\_\_\_ Date: \_\_\_\_\_

Accepted: \_\_\_\_\_ Date: \_\_\_\_\_  
(Authorized Officer)