

## Code of Ethics

The Investment Advisers Act of 1940 imposes a fiduciary duty on investment advisers like Annex. As a fiduciary, Annex has a duty of utmost good faith to act solely in the best interests of each of our clients, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels the officers, directors, employees, affiliates, and Investment Advisor Representatives [collectively, "Annex Representatives"] **to act with the utmost integrity in all of our dealings.** This fiduciary duty is the core principle underlying our Code of Ethics and represents the expected basis of all of our dealings with our clients.

This Code of Ethics consists of the following core principles:

The interests of clients will be placed ahead of the firm's or any Annex Representative's own investment interests.

Annex Representatives are expected to conduct their personal securities transactions in accordance with the firm's Personal Trading Policy and will strive to avoid any actual or perceived conflict of interest with the client.

Annex Representatives will not take inappropriate advantage of their position with the firm.

Annex Representatives are expected to act in the best interest of each of our clients.

Annex Representatives are expected to comply with federal and state securities laws and the firm's Compliance Policy Manual.

Annex Representatives are expected to exercise diligence and care with our client's confidential personal information in compliance with the firm's Privacy Policy.

Annex Representatives are expected to conduct themselves with the utmost integrity and to avoid any actual or create the perception of conflict with our clients.

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## Code of Ethics (continued)

In this spirit, the following are required of Access Persons:

Annex Representatives are prohibited from receiving any gift, gratuity, hospitality or other offering of more than \$100 in value from any person or entity doing business with Annex in any calendar year, unless the gifts are reported in accordance with Annex's gift reporting policy and the gifts are neither so frequent or excessive as to raise a question of inappropriateness.

Annex Representatives wishing to serve as director for an outside company or engage in business activities outside of Annex must first seek the approval of the firm's Chief Compliance Officer who will determine whether such service is consistent with the interests of the firm and our clients.

Annex Representatives must acknowledge that they have read, understand and agree to comply with this Code of Ethics. All Annex Representatives are required to acknowledge as such at the time they join Annex and then annually thereafter in connection with the firm's annual policy manual acknowledgement.

*We Are Proud to be a Better Business Bureau  
Accredited Company*



## Privacy Policy & Code of Ethics



### Corporate Headquarters

18650 W. Corporate Drive, Suite 300  
Brookfield, WI 53045  
(262) 786-6363  
fax (262) 792-8930  
annexadvisors.com

## Privacy Policy

### *Our Promise to You*

As a client of Annex Wealth Management, LLC®, you share both personal and financial information with us. We understand that you expect us to protect this information and use it responsibly. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information. That is why we have adopted the following policies as *Our Promise to You* to protect the privacy of your nonpublic personal information.

### *Information Provided by Clients*

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding your identity such as name, address, email address, telephone number, and social security number, drivers license information, passport information, and other information that permits us to contact or communicate with you ;
- Salary, employment, occupation, and tax information;
- Information regarding insurance and securities transactions; and
- Financial information such as net-worth, assets, income, financial statements, holdings reports, insurance records, investment records, banking information and other information you may elect to supply to us.

### *How We Collect Information About You*

We collect non-public personal information from a variety of sources, including:

- Information we receive from you on New Account Forms, applications, questionnaires, contracts, and other forms;
- Information we receive from you when you communicate with us in writing, electronically, by telephone, through our website or whenever you communicate with us or request information from us;
- Your business dealings and transaction with us, our affiliates, investment managers with which we have sub-advisor contracts, account custodians, billing and reporting service providers, affiliated and unaffiliated product sponsors whose products you own, and other arrangements we have entered into to provide services to you.

## Privacy Policy (continued)

### *Information That We Disclose*

Where allowed by law, we disclose non-public personal information about you to affiliated and unaffiliated third parties that provide services to us, or with whom we have contractual relationships, so that we may more effectively provide services to you. These will include:

- Sub-Advisors and third-party money managers that provide advisory/management services to your accounts;
- Broker/Dealers we direct transactions to for execution;
- Broker/Dealers with whom Annex is registered and those with whom Annex may seek registration;
- Investment companies, insurance companies, and other investment product providers to effect transactions and provide services to your accounts;
- Clearing Firms through whom we clear and settle securities transactions;
- Custodians who provide services to your accounts;
- Companies that provide billing and performance reporting services;
- Credit Unions, Banks, and other third-parties with which we have joint-marketing agreements for the marketing and offer of our contracted services;
- Companies that assist us in maintaining books and records, meeting regulatory requirements, and facilitating mailings or publications on our behalf;
- Federal, State or other agencies with regulatory authority over us, where required by law or regulation;
- Other third-parties and associates that provide services to us so that we may in turn provide effective services to you including those companies, associations, agencies, institutions and third-parties with which we or our representatives are licensees, registrants or Members;
- Companies with whom we have entered into a confidential memorandum to explore potential registration opportunities, mergers or acquisitions; and
- In certain circumstances, your advisor if he or she chooses to leave Annex for another firm, subject to the requirements or limitations of applicable law. However, you may opt out of this information sharing if you do not want your advisor to take your personal information to his or her new firm by contacting us at 262-786-6363 .

Where we share your non-public personal information with third parties for the purposes noted above, we ensure that there are contractual agreements in place prohibiting the third party from using or disclosing the information for any purpose other than for which it has been contracted or from further sharing that information with any other parties. Except as provided above, we will not share nonpublic personal information of our clients or former clients with any third-party, affiliated or unaffiliated, for marketing or other purposes.

## Privacy Policy (continued)

### *How We Manage and Protect Your Personal Information*

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, if necessary, in order to process a transaction, service an account or as permitted by law. Additionally, we may share information with outside companies that perform administrative services for us. However, our contractual arrangements with these service providers require them to treat your information as confidential.

In order to protect your personal information, we maintain security policies and procedures reasonably designed to prevent unauthorized use or access. In addition to your advisor and their professional staff, your information is available to employees for various business purposes, such as processing or servicing transactions and accounts, and those fulfilling compliance, legal, internal review and audit functions. Our computer systems utilize password protection to prevent access by unauthorized persons, and we employ other physical, electronic and procedural safeguards to protect your personal information in accordance with state and federal privacy regulations. Our Privacy Policy restricts the use of client information and requires that it be held in strict confidence.

### *Client Notifications*

We are required by law to annually provide a notice describing our Privacy Policy. In addition, when we make material changes to our Privacy Policy we will post an appropriate notice to our website at [www.annexadvisors.com](http://www.annexadvisors.com) and may send you an amended copy in the mail. Please do not hesitate to contact us with questions about our Privacy Policy.

