



Code of Ethics for Financial Professionals

The primary purpose of this Code of Ethics is to provide consumers with the information they need to determine the integrity of financial professionals. In addition, this Code of Ethics differentiates advisors who provide consumers with written documentation for their ethical practices from advisors who do not.

Consumers should view this Code of Ethics and print a copy so they have a permanent record of the content. It is Paladin Registry's opinion that consumers should have a written record of all important information that they rely on when they select advisors to help them achieve their financial goals.

Code of Ethics

As a member of the Paladin Registry I know consumers need objective information when they select financial advisors. I also know the critical importance of ethics in my relationships with clients and the critical role I play in the achievement of their financial goals. By providing a copy of the Paladin Registry's Code of Ethics, I agree to adhere to the following ethical principles:

- I acknowledge I am a Registered Investment Advisor or Investment Advisor Representative with a current registration that permits me to provide financial advice for fees.
- I acknowledge I am a fiduciary when I provide financial advice and services.
- I will serve my clients with integrity, competence, independence, objectivity, and professionalism.
- I will not misrepresent or omit any information, when marketing my services, which would cause consumers to select me for the wrong reasons.
- I will provide full written disclosure for my credentials, ethics, business practices, and services (See my Paladin Registry Profile).
- I will only provide advice and services when I possess the necessary knowledge to provide expert advice and quality services.
- I will maintain my levels of knowledge and professionalism by participating in the continuing education programs of recognized associations and other third party service providers.
- I will achieve a thorough understanding of my clients' current situations, concerns, needs, and goals before I provide any financial advice or services.
- I will provide investment advice that is suitable in regard to my clients' return objectives and tolerances for risk.
- I will establish realistic expectations of the benefits and results that clients can expect from my advice and services.
- I will maintain the confidential nature of all client information and take reasonable steps to prevent access to the information by unauthorized people.
- I will provide open-architected financial strategies that give my clients a broad range of investment choices not limited to any particular company or group of products.

- I will avoid potential conflicts of interest that impact the risk exposure, performance, or expenses of my clients' assets.
- I will avoid products that represent potential conflicts of interest or excessive expenses or risk to my clients.
- I will be in compliance with all regulatory and statutory requirements that impact the delivery of my planning or investment services.
- I will provide reports and communications that can be easily understood by clients who are not investment experts.
- I will answer all client requests for information or resolution of problems in a timely, complete, and truthful manner.
- I will extend extra time and consideration to clients who have recently become responsible for significant asset amounts or are facing substantial emotional trauma - for example, pending or recent retirees, widows and widowers, divorcees, and the terminally ill.
- I will have an agreement in place with clients in regard to the basis and amount of my compensation before any advice or services are rendered.
- I will provide full disclosure for all sources of compensation that result from my advice and services.
- I will not accept additional amounts of compensation or other benefits from third parties for my advice or services to clients without my clients' knowledge in advance.
- I will provide a written service agreement that is counter-signed by clients and does not contain provisions that are in conflict with any applicable regulations or fiduciary standards of care.
- I will maintain appropriate records that document my analysis, advice, and client communications.

Certification

I certify the information in this Code of Ethics accurately reflects the ethical standards that govern my relationships with clients.

Name of Financial Professional: Heidi Clute

Date of Agreement: October 24, 2007