[INVESTMENT CLUB] CODE OF ETHICS

[Investment Club] members are expected to be civic minded and willing to operate with high standards of honesty and integrity. It is our duty to conduct ourselves with the highest principles of the free enterprise system. We wish [Investment Club] to be synonymous with competency and fairness. As [Investment Club] members, we hereby bind ourselves to this code of ethics.

1. *We shall not discriminate against any person with regard to race, color, religion, age, national origin, sex, handicap or familial status as defined by current law.*
2. *We shall refrain from engaging in any illegal practices, or defrauding any member, customer or associate, with the aim of always conducting business in a professional manner.*
3. *We shall endeavor to stay informed and updated on matters affecting the market, and adhere to local, provincial and federal laws.*
4. *We are all individually responsible for our own due diligence and continuing education. Members are expected to verify any and all assumptions regarding business decisions to prevent falling victim to fraud, misrepresentations and illegal practices.*

Further, if any allegations of conduct considered detrimental to the purposes and interests of [Investment Club] are received in a written and signed communication to the Board of Directors, the Executive Committee will consider the matter. Should a decision to take further action be made, the Secretary shall furnish a copy of said allegation(s) to the accused, who shall be given adequate time to reply. Thereafter, the Board of Directors shall take such further action as it may deem proper and in accordance with the bylaws.