



Code of Ethics and Standards of Professional Conduct

According to Rule 204A-1 of the Advisers Act, investment advisers must establish, maintain, and enforce a Code of Ethics. An adviser's Code of Ethics must establish and describe a standard of business conduct that the adviser requires of all its supervised persons. While Rule 204A-1 does not require an adviser to adopt a particular standard, the Code of Ethics must reflect the adviser's fiduciary obligations and those of its supervised persons and must require compliance with federal securities laws. Strategic Investment Advisors ("SIA") has established a Code of Ethics which will apply to all supervised persons of SIA. Persons associated in any manner with SIA will be considered supervised persons for the purpose of this Code of Ethics. This Code will be available and distributed to all supervised persons of SIA. A summary of this Code of Ethics will be disclosed in SIA's FORM ADV along with a statement informing clients that they may request an entire copy of the Code of Ethics. If a client makes a request for a copy of this Code of Ethics, Compliance will provide a copy within ten business days of receiving the request.

The Chief Compliance Officer is responsible for maintaining the Code of Ethics Request/Receipt Log and will record all client requests for and delivery of the Code of Ethics. For a copy, please contact the Firm at 248.567.6688 and request the Compliance Department.