



## Code of Ethics

The IWN Code of Ethics (the “Code”) is our compilation of Sections 204-A and 206 of the Investment Advisers Act of 1940 (the “Advisers Act”) and Rule 204-2 and 17j-1 of the Investment Act of 1940 (“the Investment Act”). The Code is our guideline to make our Investment Advisor Representatives (“IARs”) aware of conduct and behavior we want to exemplify in prohibiting trading upon material non-public information; inappropriate advantage using personal transactions, or taking advantage of their access to information that comes with their position. This Code further addresses other prohibited activities, reporting requirements, confidentiality requirements, and standards of care.

**Independent Wealth Network Inc. (“IWN”) owes a fiduciary duty to its clients.** Accordingly, IARs and employees must avoid activities, interests and relationships that run contrary (or appear to run contrary) to the best interests of our clients.

To avoid any potential conflicts of interest involving personal securities transactions, IWN IARs and employees (including family accounts) must always:

- 1) Place clients’ interest ahead of the themselves and the firm. As a fiduciary, they must serve in its clients’ best interests and may not benefit at the expense of clients.
- 2) Make an equitable allocation of securities to clients before making allocations to accounts owned by IARs, employees, or their families – all considering available capital and current positions. When an IAR or employee has direct or indirect beneficial interest in an account all firm requirements to prior approval of proper reporting of the account and activity must be strictly adhered to.
- 3) Avoid accepting valuable (over \$100.00) investment opportunities, gifts, or gratuities from individuals seeking to conduct business with the firm or on behalf of a client.
- 4) Abide by disclosure standards, Policy on Confidential Information, and Insider Trading Policy regarding personal securities trading and reporting on IWN’s Outside Securities Transactions.
- 5) Protect all client information and confidentiality by properly securing their computers, mobile devices, external storage units and records; and only authorize access to employees or vendors who have a legal business need for information in completing a customer transaction.

IARs and employees must promptly report any violations of the Code to the Compliance Department, which will be treated on an anonymous basis. IWN monitors and reviews these concerns on a continuous basis and will provide a copy of the Code to any client or prospective client upon request.

**I HAVE READ, UNDERSTAND, AND AGREE TO ABIDE BY THE CODE OF ETHICS.**

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_ Date \_\_\_\_\_