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“THE PILOT’S ADVISOR” LLC CODE OF ETHICS

The Pilot's Advisor LLC Code of Ethics

General Policy

This Code of Ethics has been adopted by The Pilot's Advisor LLC and is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 (“Advisers Act”). This Code establishes rules of conduct for The Pilot's Advisor LLC and establishes that we have a fiduciary duty to all of our advisory clients to conduct ourselves to act in their best interest at all times. They hold us in a position of trust and responsibility. Our firm will act with more than honesty and good faith. The Pilot's Advisor LLC has an affirmative duty of utmost good faith to act solely in the best interest of its clients. These duties will include:

- The duty to have a reasonable, independent basis for the investment advice provided;
- The duty to obtain best execution for a client’s transactions as is possible, given the relevant clearing arrangement;
- The duty to ensure that investment advice is suitable to meeting the client’s individual objectives, needs, and circumstances; and a duty to be loyal to clients.

In meeting its fiduciary responsibilities to its clients, The Pilot's Advisor LLC expects everyone to demonstrate the highest standards of ethical conduct. Strict compliance with the provisions of the Code shall be considered a basic condition of practice. The provisions of the Code are not all-inclusive. Rather, they are intended as a guide for continued actions in the best interest of our clients. For the purposes of this Code, the

Standards of Business Conduct

The Pilot's Advisor LLC places the highest priority on maintaining its reputation for integrity and professionalism. That reputation is a vital business asset. The confidence and trust placed in our firm and by our clients is something we value and will protect.

The following Standards of Business Conduct set forth policies and procedures to achieve these goals. This Code is intended to comply with the various provisions of the Advisers Act and also requires that all supervised persons comply with the various applicable provisions of the Investment Company Act of 1940, as amended, the Securities Act of 1933, as amended, the Securities Exchange Act of 1934, as amended, and applicable rules and regulations adopted by the Securities and Exchange Commission ("SEC"). Section 204A of the Advisers Act requires the establishment and enforcement of policies and procedures reasonably designed to prevent the misuse of material, nonpublic information by investment advisers. Such policies and procedures are contained in this Code. Section 206 of the Advisers Act makes it unlawful for The Pilot's Advisor LLC to employ any device, scheme or artifice to defraud any client or prospective client, or to engage in fraudulent, deceptive or manipulative practices. The Pilot's Advisor LLC will not trade individual securities and therefore, will not be in a position to use insider trading knowledge for any transactions. All investments will be in funds using third party managers.

Gifts and Entertainment

Giving, receiving, or soliciting gifts in a business setting may create an appearance of impropriety or may raise a potential conflict of interest. The Pilot's Advisor LLC has adopted these policies to deter this action.

- Giving, receiving, or soliciting gifts in a business may give rise to an appearance of impropriety or may raise a potential conflict of interest;
- The Pilot's Advisor LLC should not accept or provide any gifts or favors that might influence the decisions one would make or reasonably could be perceived would influence those decisions;
- Modest gifts and favors, which would not be regarded by others as improper, may be accepted or given on an occasional basis. Entertainment that satisfies these requirements and conforms to generally accepted business practices also is permissible;
- Where there is a law or rule that applies to the conduct of a particular business or the acceptance of gifts of even nominal value, the law or rule must be followed.

Protecting the Confidentiality of Client Information

In the course of investment advisory activities of The Pilot's Advisor LLC, the firm gains access to non-public information about its clients. Such information may include a person's status as a client, personal financial and account information, the allocation of assets in a client portfolio, the composition of investments in any client portfolio, information relating to services performed for or transactions entered into on behalf of clients, advice provided by The Pilot's Advisor LLC to clients. Any doubts about the confidentiality of information must be resolved in favor of confidentiality.

Non-Disclosure Of Confidential Client Information

All information regarding The Pilot's Advisor LLC client's is confidential. Information may only be disclosed when the disclosure is consistent with the firm's policy and the client's direction. The Pilot's Advisor LLC does not share Confidential Client Information with any third parties unless as necessary to provide service that the client requested or authorized, or to maintain and service the client's account. The Pilot's Advisor LLC will require that any financial third party comply with similar standards for non-disclosure and protection of Confidential Client Information and use of the information. The firm restricts access to Confidential Client Information in connection with the performance of such person's duties and responsibilities is required to keep such information in a secure compartment, file, or receptacle on a daily basis as of the close of each business day; All electronic or computer files containing any Confidential Client Information shall be password secured and firewall protected from access by unauthorized persons.

Custody of Client's Assets and Investments

All of The Pilot's Advisor LLC clients will have their assets with the custodian where those monies are invested. The Pilot's Advisor LLC will not custody any client assets and will only have a direct business relationship with those entities using their agreement forms and procedures. These third parties will be responsible for the laws and regulations concerning the custody of those assets.

Personal Trading

The Pilot's Advisor LLC prohibits all supervised persons from trading individual securities. All investments will be in funds managed by third-party managers. This policy eliminates any potential conflicts of interest related to personal trading. Supervised persons are required to report any personal investment accounts and holdings, and any new accounts or transactions must be pre-approved by the Chief Compliance Officer (CCO). Regular reviews will be conducted to ensure adherence to this policy.

Reporting Violations

All supervised persons have a duty to report any known or suspected violations of this Code of Ethics promptly. Reports should be made to the Chief Compliance Officer (CCO) or, if the CCO is involved, to another member of senior management. The Pilot's Advisor LLC will investigate all reported violations thoroughly and take appropriate action, which may include disciplinary measures up to and including termination of employment. Retaliation against any individual who reports a violation in good faith is strictly prohibited.

Acknowledging the Code

All supervised persons are required to acknowledge that they have received, read, and understood this Code of Ethics. New employees must provide this acknowledgment upon joining the firm, and all employees must reaffirm their understanding and compliance with the Code annually. This acknowledgment serves to reinforce the importance of ethical conduct and the firm's commitment to upholding the highest standards of professional behavior.

The Pilot's Advisor Code of Ethics

1. Integrity and Honesty

- We uphold the highest standards of integrity and honesty in all our dealings with clients, colleagues, and the public.
- We are committed to providing accurate and transparent information to our clients, ensuring they can make informed decisions about their financial future.

2. Client Focused

- We prioritize the best interests of our clients above all else, striving to understand their individual needs, goals, and risk tolerances.
- We maintain confidentiality and protect the privacy of our clients, ensuring their trust and confidence in our services.

3. Compliance with Laws and Regulations

- We adhere strictly to all applicable laws, regulations, and industry standards governing our profession.
- We continuously educate ourselves and stay updated on changes in regulations to ensure full compliance and mitigate risks.

4. Objectivity and Independence

- We provide objective and unbiased advice, free from conflicts of interest or undue influence from third parties.
- We disclose any potential conflicts of interest to our clients and take appropriate measures to manage and mitigate them.

5. Professional Competence

- We continuously strive to enhance our professional competence and expertise through ongoing education, training, and professional development.
- We maintain the highest standards of competence in our areas of specialization and stay abreast of emerging trends and best practices in the financial industry.

6. Transparency and Disclosure

- We provide clear and comprehensive disclosures regarding our services, fees, compensation structures, and any potential risks associated with investment products.

- We ensure that our clients have a thorough understanding of the nature and scope of our services and any associated costs before engaging our firm.

7. Duty of Care

- We exercise due care, diligence, and prudence in the management of our clients' assets, striving to maximize returns while minimizing risks.
- We regularly review and monitor our clients' investment portfolios to ensure alignment with their stated objectives and risk preferences.

8. Professionalism and Respect

- We treat all individuals with professionalism, respect, and dignity, regardless of their background, status, or beliefs.
- We foster a culture of inclusivity and diversity within our firm, recognizing the value of different perspectives and experiences.

9. Social Responsibility

- We are committed to being responsible corporate citizens, contributing positively to the communities in which we operate.
- We support charitable initiatives and environmental sustainability efforts that align with our values and priorities.

10. Accountability and Transparency

- We accept responsibility for our actions and decisions, holding ourselves accountable for delivering on our commitments to clients and stakeholders.
- We maintain open and transparent communication channels, welcoming feedback and constructive criticism to continuously improve our services and operations.

11. Upholding the Code

- We pledge to uphold and promote the principles outlined in this Code of Ethics, holding ourselves and our colleagues accountable for maintaining the highest standards of professional conduct.
 - We encourage reporting of any violations or breaches of this Code, ensuring prompt investigation and appropriate disciplinary action if necessary.
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"The Pilot's Advisor" LLC

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