

CODE OF ETHICS

The Investment Advisors Act of 1940 (ACT) requires all investment advisors who are registered with the Securities and Exchange Commission (SEC) adopt a Code of Ethics.

Sunrise Wealth Management, LLC (SWM) is an Investment Advisor registered with the state of Arizona providing comprehensive financial planning and investment management services. SWM feels strongly that the client's interest be placed above the interest of employees and the firm. For this reason, our Code of Ethics contains the following principals:

1. Every employee will place the interests of the client first.
2. Every employee will conduct all personal securities transactions in a manner that is consistent with the Code of Ethics and to avoid any actual or potential conflict of interest.
3. No adviser should take inappropriate advantage of their position of client trust.
4. Every employee has a fiduciary responsibility to keep all information about clients confidential.

FIDUCIARY

The firm and employees have a duty of care, loyalty, honesty and good faith to act in the best interests of its clients. The firm and all employees must avoid conflicts of interest and disclose all material facts concerning any conflict that might arise with respect to any client. This requires us to avoid situations that have even the appearance of conflict or impropriety.

SUPERVISED PERSONS

The Code of Ethics applies to all Supervised Persons, which the Act defines to mean any partner, officer, director or other employee of an investment advisor or other person who provides investment advice on behalf of the investment advisor. SWM has prepared a Manual that contains the Policies and Procedures necessary to ensure the company operates in an efficient manner while adhering to legal standards established for our industry. All Supervised Persons are expected to become familiar and comply with the Manual as well as this Code of Ethics.

CONFIDENTIALITY

All employees are obligated to hold all client personal and business information in strict confidence. Releasing this confidential information is allowed only in specific situations, such as defined in our Privacy Policy.

Every client discloses highly sensitive and confidential personal information to SWM employees. If this information were inappropriately disclosed, whether accidentally or intentionally, the reputation of SWM and its ability to conduct its business could be seriously, severely and permanently damaged. For this reason, misuse of this information or discussing client information (including names) with anyone outside SWM's business is prohibited and could be cause for dismissal.

PERSONAL SECURITIES TRANSACTIONS

All Access Persons of SWM must report their personal securities transactions and holdings periodically. An Access Person means any supervised persons who have access to nonpublic information regarding any advisory client's purchase or sale of securities or nonpublic information regarding the portfolio holdings of any reportable fund; or is involved in making securities recommendations to advisory clients or who has access to such recommendations that are nonpublic.

Beneficial Ownership includes any person who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, has or shares a direct or indirect pecuniary interest in a security. Examples might include spouse, minor children, relative who shares his or her home.

HOLDINGS REPORT

Access Persons must submit a report of all holdings in "reportable securities" within 10 days of becoming an access person and thereafter on an annual basis. This holdings report should contain the following: Date of report, Symbol, Description, Shares, Value, and Custodian.



TRANSACTIONS REPORT

Access Persons must submit a Transaction Report within 30 days after end of each quarter. This report should contain the following: Date of report, Transaction date, Type of transaction (buy/sell), Symbol, Description, Shares, Price, Amount, Broker. This requirement can be satisfied by having the custodian send monthly or quarterly statements directly to SWM.

EXCLUDABLE REPORTABLE HOLDINGS AND TRANSACTIONS

Accounts where access person has no direct or indirect influence or control. Transactions effected pursuant to an automatic investment plan, including dividend reinvestment.

Open end investment company shares.

Unit investment trusts.

Exchange traded funds.

Debt securities, unless convertible to common stock.

REVIEW

All Holdings and Transaction reports will be reviewed and initialed by a Partner of SWM, however a Partner can not review his/her own report.

PRIOR APPROVAL

No employee will participate in an IPO without written consent from a Partner of the firm. Any personal transaction that exceeds \$500,000 will have prior approval of a Partner of the firm.

RECORDKEEPING

All documents required, relative to personal trading, will be kept for the period required by law.

PRIVACY POLICY

SWM strongly believes in protecting the confidentiality and security of information we collect about our clients. We collect this information to help us provide our services. Typically, clients will

provide us with certain personal information we need to complete our analysis and make recommendations.

The personal information we collect may include name and address; social security or taxpayer identification number; assets; income; account balances; investment activity and other financial information.

We protect our client's privacy by not selling their personal information to anyone and treat all information of current a former clients in a confidential manner. We may access information and provide it to third parties only when completing a transaction on the client's behalf.

At our client's request, we may disclose information to attorneys, accountants, lawyers, securities professionals and others to assist us, or them, in providing services. We may also share information with companies that perform services on our behalf, such as the companies that we hire to perform marketing or administrative services. Companies we may hire to provide support services are not allowed to use client's personal information for their own purposes. We may make additional disclosures as permitted by law.

We also maintain physical, electronic, and procedural safeguards to protect information. Employees and our professional service representatives are required to comply with our established information confidentiality provisions.

Generally, upon written request from the client, we will make available information for their review. Information collected in connection with, or in anticipation of any claim or legal proceeding will not be made available.

VIOLATIONS OF THE CODE OF ETHICS

If an employee knows of, or reasonably believe there has been a violation of this Code of Ethics, that employee must report all pertinent information immediately to a Partner of SWM. Any person who in good faith raises an issue regarding a possible violation will be protected from retaliation.

