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CERTIFIED FINANCIAL PLANNER™ Professional

CLEAR VIEW WEALTH ADVISORS, LLC
Plan Well. Invest Smart. Live Better.

Code of Ethics - Summary

We have adopted a Code of Ethics (“Code”) that is occasionally amended. This Code is provided to each member of our staff and is available to you upon written request. It is based on the code of ethics promulgated by the Certified Financial Planner Board of Standards.

The Code provides guidance on how our staff is expected to conduct themselves.

We expect our staff to conduct themselves with honesty and integrity and in compliance with all rules, laws and regulations of the state and federal agencies that may regulate us.

Our Code contains provisions preventing misuse of client accounts, transaction history and confidential information.

Our Code includes the following:

- **Fiduciary Standards:** In our dealings with clients we act as a fiduciary.
- **Duty of Confidentiality:** Every effort is made to maintain physical and electronic safeguards to protect a client’s personal non-public information.
- **Duty of Reporting and Investigating Suspected Wrongdoing:** Employees have a duty to report any suspected wrongdoing to a manager or to an appropriate regulatory or investigative authority.
- **Handling Gifts and Entertainment:** To avoid the appearance or misperception of impropriety, employees may only give or accept gifts or services of a nominal value.
- **Outside Employment:** Employees are allowed to have outside employment or volunteer activities as long as they are reported to management and disclosed as may be needed to clients.
- **Insider Trading:** Employees are prohibited in using or passing along to others any inside information that may be learned while dealing with a client or client accounts.
- **Personal Securities Transactions:** Employees must report securities transactions and holdings regularly to the Chief Compliance Officer.
- **Required Reports and Certifications:** Employees will complete required reports and certifications as may be required by the Chief Compliance Officer from time to time.
- **Sanctions:** Sanctions will depend on the severity of the non-compliance breach. Generally, management will initiate with a warning, counseling and possible dismissal in line with the remedies outlined in the company’s employee manual.
- **Compliance Review:** The Chief Compliance Officer will review policies and procedures at least biennially for changes.
- **Allowed Exceptions to the Code:** These may be updated by the Chief Compliance Officer from time to time based on updated industry practice management standards.

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A Registered Investment Adviser

Code of Ethics and Professional Responsibility for Planning Professionals

CFP Board adopted the Code of Ethics to establish the highest principles and standards. These Principles are general statements expressing the ethical and professional ideals certificants and registrants are expected to display in their professional activities. As such, the Principles are aspirational in character and provide a source of guidance for certificants and registrants. The Principles form the basis of CFP Board's Rules of Conduct, Practice Standards and Disciplinary Rules, and these documents together reflect CFP Board's recognition of certificants' and registrants' responsibilities to the public, clients, colleagues and employers.

Principle 1 – Integrity: Provide professional services with integrity.

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Certificants are placed in positions of trust by clients, and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity: Provide professional services objectively.

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence: Maintain the knowledge and skill necessary to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Certificants make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness: Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.

Principle 5 – Confidentiality: Protect the confidentiality of all client information.

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism: Act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. Certificants cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence: Provide professional services diligently.

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Participation or Interest in Client Transactions

Our employees and their relatives may also be clients of the firm and may buy or sell securities that we may also recommend to you, including mutual funds and other widely-held publicly-traded securities.

We generally do not favor one client over another when making recommendations. We may take investment action for you or any other client contemporaneously subject to suitability and client objectives of each client account.

We will handle purchases and sales in your account first before trading for a staff member unless it is related to mutual funds and certain widely-held securities where the trading will be incidental relative to the total outstanding value of the security and have a negligible impact on market price.

For other thinly-traded securities, you and your account will be provided with an opportunity to establish or decline taking a position at least one trading day before one of our employees may buy or sell that same security.

We do not act as a principal or agent in any investment that we may recommend to you. We do not lend to or borrow money from clients and will not participate as a co-investor with you as a client. We do not share in the gains or losses of your account.

We enforce written policies reasonably designed to prevent the misuse of material non-public information by us, our employees or other persons related or affiliated with us or our staff.

We also use our best efforts to make sure that our employees do not use information about transactions in your account to profit at your expense by making trades in their own or other accounts that could affect the value of holdings in yours.

All staff members are required to report personal securities holdings and transactions to our Chief Compliance Officer for review on a regular basis.

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