

## **Insider Information and Trading Policy**

### **Jepsen Enterprises, Inc.**

Jepsen Enterprises, Inc. ("The Firm") continues to have systems in establishing, maintaining, and enforcing policies and procedures designed to prevent the misuse of material non-public information defined in section 204(a) of The Investment Advisors Act of 1940.

The Firm's manages investment capital using of mutual funds and other publicly traded securities. The Firm prides itself in honesty, integrity, and ethical conduct.

It is against SEC rules to trade securities based on material non-public information. Any inside information obtained by officers, associates, or employees of The firm shall not be used to the individuals or firm's benefit by trading in these securities in personal transactions or client accounts. In addition, no communication of inside information is allowable under the SEC's or the firm's guidelines.

Occasional briefings and/or review will take place with regard to these procedures, and any employee that goes against the rules, regulations, and ethics of these policies will be in violation of the firms as well as the SEC's code, and disciplinary action will be taken.

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