

SUMMARY OF OUR CODE OF ETHICS

WT Wealth Management investment professionals must act with integrity, competence, diligence, respect and in an ethical manner with the public, clients, prospective clients, colleagues in the investment profession, and other participants in the global capital markets.

WT Wealth Management employees must put Client interests before their own personal interests and must act honestly and fairly in all respects in dealings with Clients.

All investment professionals must use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities.

We encourage our investment professionals to carefully maintain and consistently improve their professional competence.

DUTIES TO CLIENTS

WT Wealth Management Investment Advisor Representatives (IAR's) have a duty of loyalty to their clients and must act with reasonable care and exercise prudent judgment. IAR's must act for the benefit of their clients and place their clients' interests before their employer's or their own interests.

IAR's must deal fairly and objectively with all clients when providing investment analysis, making investment recommendations, taking investment action, or engaging in other professional activities.

FIDUCIARY STANDARD

When WT Wealth Management IAR's are in a fiduciary relationship with a client, they must:

- Abide to a fiduciary standard that was established as part of the Investment Advisors Act of 1940. IAR's can be regulated by the SEC or state securities regulators, both of which hold advisors to a fiduciary standard that requires them to put their client's interests above their own.
- Make a detailed inquiry into a client's or prospective client's investment experience, risk and return objectives, and financial constraints prior to making any investment recommendation or taking investment action -- along with updating this information regularly.
- Determine that an investment strategy is "most appropriate" for the client's specific financial situation and consistent with the client's investment objectives before making an investment recommendation or taking investment action.

PERFORMANCE PRESENTATION

When communicating investment performance information, IAR's must make reasonable efforts to ensure information is a fair, accurate, and complete representation of their client's actual performance. WT Wealth Management uses a client portal powered by Advyzon so performance data is clear, concise and transparent and readily available for clients through the previous day's close of business.

PRESERVATION OF CONFIDENTIALITY

WT Wealth Management IAR's must keep information about current, former, and prospective clients confidential unless:

- The information concerns illegal activities on the part of the client or prospective client
- Disclosure is required by law, or
- The client or prospective client permits disclosure of the information.

INVESTMENT ANALYSIS, RECOMMENDATIONS, AND ACTIONS

WT Wealth Management IAR's must:

- Exercise diligence, independence, and thoroughness in analyzing investments, making investment recommendations, and taking investment actions.
- Have a reasonable and adequate basis, supported by appropriate research and investigation, for any investment analysis, recommendation, or action.
- Communicate regularly with clients.
- Disclose to clients and prospective clients the basic format and general principles of the investment processes they use to analyze investments, select securities, and construct portfolios and must promptly disclose any changes that might materially affect those processes.
- Disclose to clients and prospective clients significant limitations and risks associated with the investment process.
- Use reasonable judgment in identifying which factors are important to their investment analyses, recommendations, or actions and include those factors in communications with clients and prospective clients.
- Distinguish between fact and opinion in the presentation of investment analysis and recommendations.
- Develop and maintain appropriate records to support investment analyses, recommendations, actions, and other investment-related communications with clients and prospective clients.

CONFLICTS OF INTEREST

WT Wealth Management's team of IARs must make full and fair disclosure of all matters that could reasonably be expected to impair their independence and objectivity or interfere with respective duties to their clients, prospective clients, and employer. IARs must ensure that such disclosures are prominent, are delivered in plain language, and communicate the relevant information effectively.

IARs must disclose to their employer, clients, and prospective clients, as appropriate, any compensation, consideration, or benefit received from or paid to others for the recommendation of products or services.

IARs must not accept gifts, benefits, compensation, or consideration that competes with or might reasonably be expected to create a conflict of interest with their client's best interest.

*Please email compliance@wtwealthmanagement.com
if you would like to receive a full copy of our Code of Ethics.*