

Aurea Investments LLC — Code of Ethics

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Purpose and Scope

This Code governs all supervised persons and access persons. We owe clients a fiduciary duty of loyalty and care, including full and fair disclosure of material conflicts and obtaining informed consent. All supervised persons must comply with applicable State and Federal securities laws.

Review, Acknowledgment, and Enforcement

The CCO reviews this Code at least annually. All supervised persons must sign initial and annual acknowledgments, and promptly report potential violations to the CCO. Violations may result in discipline up to and including termination.

Personal Trading; Reports and Pre-Clearance

Access persons must submit Initial and Annual Holdings Reports and Quarterly Transaction Reports; pre-clear IPOs/private placements; and comply with blackout restrictions when imposed.

Initial Holdings Report (content and timing)

- Due within 10 days of becoming an access person and current within 45 days prior to submission.
- Report must include: account title and financial institution; security title and type; ticker or CUSIP; number of shares and/or principal amount; interest rate and maturity (for fixed income); and the date the report is submitted.

Annual Holdings Report (content and timing)

- Due within 45 days after each calendar year-end and current within 45 days prior to submission.
- Report must include: account title and financial institution; security title and type; ticker or CUSIP; number of shares and/or principal amount; interest rate and maturity (for fixed income); and the date the report is submitted.

Quarterly Transaction Reports (content and timing)

- Due within 30 days after each calendar quarter-end.
- Include: date of transaction; security title; ticker or CUSIP; interest rate and maturity (for fixed income); number of shares; principal amount; nature of transaction (purchase/sale/other); price; broker/dealer/bank; and the date the report is submitted.
- All transactions during the quarter must be reported.

Submission and Signature Requirements

All personal trading reports (initial, quarterly, annual) must be signed and dated by the access person and submitted to the CCO (or designee) via secure email or portal. The CCO will acknowledge receipt and retain records per Rule 204-2.

Pre-Clearance and Restricted Transactions

Obtain approval before directly or indirectly acquiring beneficial ownership in any security in an initial public offering (IPO) or private placement.

Small Adviser Treatment

As a small advisory firm with a single access person, the CCO maintains personal trading records that would otherwise be reported by access persons; nonetheless, all reporting, pre-clearance, and restrictions apply.

Gifts, Entertainment, Political Contributions, and MNPI

Gifts or non-cash compensation in excess of \$100 from service providers or product sponsors are prohibited. We prohibit the use or communication of MNPI. Political contributions must comply with applicable pay-to-play rules.

Insider Trading and Confidentiality

We maintain procedures reasonably designed to prevent the misuse of MNPI and to protect client confidentiality.