



Code of Conduct – Attestation

The Code of Conduct² provides REDITUS colleagues with high-level guidance regarding compliance functions, ethical behavior, specific risk areas, and behavioral expectations. This attestation applies to all colleagues, as well as individuals who conduct business for or with REDITUS. Each individual, upon reading the Code of Conduct in its entirety, must complete this attestation and return it to the designated member of the Compliance Committee within thirty (30) days of hire and annually thereafter.

Attestation

1. I confirm that I have received, read, and understand the Code of Conduct.
2. I understand that anything that was unclear to me in the Code of Conduct should be addressed for clarification to my supervisor, Chair of the Compliance Committee (“Chair”), and/or designated Chief Compliance Officer (“CCO”).
3. I confirm I will exercise my duties while adhering to the standards set forth in the Code of Conduct and REDITUS’ policies and procedures.
4. I understand that I have a responsibility to report all (real or suspected) violations of the Code of Conduct and REDITUS’ policies and procedures to my supervisor, the Chair, any member of the Compliance Committee and/or CCO. Concerns may also be submitted anonymously to the REDITUS compliance hotline at (877) 767-9428.
5. I understand that it is against REDITUS’ policy to be punished or retaliated against for upholding the Code of Conduct, obeying the laws and regulations that apply to my job, and reporting any potential compliance concerns. Any perceived retaliation should be reported immediately to the Chair, any member of the Compliance Committee, CCO, and/or to human resources personnel.

I agree that I have read, understand, and will comply with the terms of the Code of Conduct and all applicable policies and procedures. I understand that my failure to comply with the Code of Conduct and REDITUS’ policies and procedures may result in disciplinary action, up to and including termination of employment or engagement with REDITUS.

Name: _____

Employee Email Address: _____

Check One:

Employee Temporary Employee Contractor

Vendor/Business Associate (specify): _____

_____ Other (specify): _____

Signature: _____ Date: _____

To be placed in employee file.

² Capitalized terms that are not defined in this Attestation have the same meanings as set forth in the Code of Conduct.