

**LAWTON RETIREMENT PLAN CONSULTANTS, LLC**  
**CODE OF ETHICS**  
**JANUARY 1, 2021**

Lawton Retirement Plan Consultants, LLC (LRPC) created its Code of Ethics ("Code") to help guide employees in their interactions with clients, business partners and vendors. This Code is the standard of conduct for all employees. The Code not only outlines employee fiduciary responsibilities, but also serves as a guideline for the way the firm conducts business. Along with the Code, all employees are required to comply with all applicable securities laws.

**Integrity**

You shall offer and provide professional services with integrity. In deciding what is right or wrong, you should rely on your personal integrity as a touchstone. Integrity demands honesty and candor, which must not be subordinated to personal gain or advantage. Integrity cannot co-exist with deceit or compromising of one's principles, but allowances can be made for innocent error and legitimate differences of opinion. Integrity requires you to observe not only the letter but also the spirit of the law and this Code.

**Objectivity**

You shall be objective in providing professional services. Objectivity requires intellectual honesty and impartiality. It is an essential quality for any professional. Regardless of the particular service rendered or the capacity in which you function, you should maintain objectivity and avoid compromising your judgment.

**Competence**

You shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which you are engaged. You are competent only when you have attained and maintained an adequate level of knowledge and skill and applied that knowledge effectively in providing services to clients. Continuing education is a key element in maintaining competence. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation or client referral is appropriate.

**Diligence**

You shall act diligently in providing professional services. Diligence is the provision of services in a reasonably prompt and thorough manner. Diligence also includes proper planning for and supervision of, the rendering of professional services.

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**Fairness**

You shall perform professional services in a manner that is fair and reasonable to clients, principles, partners and employers and shall disclose any conflicts of interest in providing such services. Fairness requires impartiality, intellectual honesty and disclosure of any conflicts of interest. It involves a management 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 and is an essential trait of any professional.

**Confidentiality**

You shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process to defend against charges of wrongdoing in connection with a civil dispute. A client, by seeking your services, may be interested in creating a relationship of personal trust and confidence with you. This type of relationship can only be built upon the understanding that information supplied to you will be confidential. In order to provide the contemplated services effectively and to protect the client's privacy, you shall safeguard the confidentiality of such information.

**Professionalism**

Your conduct in all matters shall reflect positively upon the profession. Because of the importance of the professional services rendered by you, there are attendant responsibilities to behave with dignity and courtesy to all those who use those services, fellow professionals and those in related professions. You also have an obligation to cooperate with other employees to improve the quality of services. It is only through the combined efforts of all employees, in cooperation with other professionals, that this vision can be realized.

Violations of this Code may subject an employee to disciplinary procedures up to and including termination.

***Robert C. Lawton, AIF, CRPS***

Founder and President  
Lawton Retirement Plan Consultants, LLC

**Lawton Retirement Plan Consultants, LLC**  
*Sustainable Investment Strategies for Retirement Plans*

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