
Code of Ethics

Effective January 2025

Convexity Wealth Management, LLC has adopted a Code of Ethics in accordance with Rule 204A-1 under the Investment Advisers Act of 1940. This Code of Ethics establishes standards of conduct for all supervised persons of the firm and addresses conflicts that arise from personal trading by firm personnel.

Statement of General Principles

This Code of Ethics is based on the principle that Convexity and its supervised persons owe a fiduciary duty to Convexity's clients. Accordingly, supervised persons must avoid activities, interests, and relationships that might interfere, or appear to interfere, with making decisions in the best interest of clients. Convexity's supervised persons must comply with applicable federal securities laws at all times.

Standards of Business Conduct

All supervised persons of Convexity must act with competence, dignity, integrity, and in an ethical manner when dealing with clients, the public, prospects, third-party service providers, and fellow employees. Supervised persons 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.

Supervised persons must not engage in any professional conduct involving dishonesty, fraud, deceit, or misrepresentation, or commit any act that reflects adversely on their integrity or competence, or the integrity or competence of Convexity.

Compliance with Laws and Regulations

Supervised persons must comply with all applicable federal and state securities laws and regulations. This includes, but is not limited to, the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, Title V of the Gramm–Leach–Bliley Act, any rules adopted by the Securities and Exchange Commission under any of these statutes, the Bank Secrecy Act as it applies to funds, and any rules adopted thereunder by the Securities and Exchange Commission or the Department of the Treasury.

Personal Securities Transactions

Supervised persons may buy or sell securities for their personal accounts, provided that such transactions do not conflict with the interests of clients. Personal securities transactions must be conducted in a manner consistent with this Code of Ethics and must avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility.

Because the firm invests exclusively in mutual funds and exchange-traded funds (ETFs), the risk of front-running or market manipulation by supervised persons is minimal. However, supervised persons are expected to report their personal holdings and transactions as required by this Code and applicable law.

Reporting Requirements

All access persons of Convexity must submit holdings reports and transaction reports to the Chief Compliance Officer as required under Rule 204A-1 of the Investment Advisers Act of 1940. Holdings reports must be submitted within 10 days of becoming an access person and annually thereafter. Transaction reports must be submitted quarterly, within 30 days of the end of each calendar quarter.

Pre-Approval of Certain Investments

Access persons must obtain pre-approval from the Chief Compliance Officer before acquiring any beneficial ownership in any security through an initial public offering or limited offering (private placement). The Chief Compliance Officer will evaluate such requests in light of the facts and circumstances of the proposed transaction.

Insider Trading

Supervised persons who are aware of material nonpublic information relating to any security are prohibited from purchasing or selling such security, or recommending the purchase or sale of such security, until such information has been publicly disclosed. Supervised persons are also prohibited from disclosing material nonpublic information to any person who does not have a legitimate need to know such information.

Gifts and Entertainment

Supervised persons must not give or accept gifts or entertainment that could create a conflict of interest or the appearance of impropriety. Any gift or entertainment with a value exceeding \$100 must be reported to the Chief Compliance Officer. Gifts or entertainment that are conditioned on directing business to a particular broker-dealer or other entity are prohibited.

Confidentiality

All information regarding Convexity's clients and their accounts must be treated as confidential. Supervised persons must not disclose any nonpublic information about clients or their accounts to any person outside of Convexity, except as required by law or as authorized by the client.

Sanctions for Violations

Violations of this Code of Ethics may result in sanctions including, but not limited to, a letter of censure, suspension, or termination of employment. In addition, violations of applicable securities laws may result in civil and/or criminal penalties.

Annual Certification

All supervised persons must certify annually that they have read and understand this Code of Ethics and recognize that they are subject to its provisions. Supervised persons must also certify annually that they have complied with the requirements of this Code and have disclosed or reported all personal securities transactions required to be disclosed or reported pursuant to the Code.