



## **Gosselin Consulting Group LLC**

### **CODE OF ETHICS**

***Annual Update: January 1, 2017***

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## **SECTION 1**

### **Introduction**

It is the belief of the founders of Gosselin Consulting Group LLC that any firm entrusted to provide objective advice on financial matters should be held to the highest ethical standards. Our success depends not only on the information and insight we deliver to our clients, but the manner in which our business is conducted with respect to honesty, integrity, professionalism, and transparency. In addition to the internal beliefs and policies of the firm, we are bound by various laws and regulations which govern the conduct of an SEC Registered Investment Adviser.

This Code of Ethics is meant to outline the standards of conduct that all employees and partners of Gosselin Consulting Group LLC shall be expected to uphold, as well as outline all policies related to confidentiality, potential conflicts of interest, personal securities trading, and other areas of employee conduct that have the potential to adversely impact the interests of our clients.

The firm's Chief Compliance Officer (CCO) is responsible for the implementation and enforcement of this Code of Ethics. A record of all employees and partners who have received and agreed to adhere to the Code of Ethics shall be maintained by the CCO. Receipt of the Code of Ethics and acknowledgement of the policies contained therein is required of (in writing) all employees and partners of Gosselin Consulting Group LLC.

## **SECTION 2**

### **Standards of Conduct**

All employees and partners of Gosselin Consulting Group LLC should adhere to the following standards of conduct, both in practice and in spirit. These standards represent the guiding principles of our business.

A Gosselin Consulting Group LLC employee/partner will:

- Act in an ethical manner at all times — in dealings with our clients, prospects, colleagues, all other business relationships, and the public
- Conduct themselves with integrity, honesty, transparency, and professionalism at all times
- Comply with state and federal securities laws at all times, including ERISA law, as applicable
- Encourage colleagues to act in a manner consistent with the guiding principles of the firm
- Act in the best interests of our clients at all times
- Always consider plan participants and their beneficiaries and act in accordance with their best interests when working with employee benefit plans governed by ERISA
- Use reasonable care and exercise professional and prudent judgement in all matters
- Seek to identify and avoid real or potential conflicts of interest for our clients and the firm, and report all such conflicts to the Chief Compliance Officer for review

### **SECTION 3**

#### **Fundamental Responsibilities**

All employees and partners of Gosselin Consulting Group LLC should adhere to the following fundamental responsibilities.

A Gosselin Consulting Group LLC employee/partner will:

- Act in the best interests of our clients
- Maintain independence and objectivity at all times
- Provide prudent advice based on an understanding of each client's unique objectives, needs, and circumstances
- Provide full and fair disclosure of all relevant and material information to clients, prospective clients, and other business relationships
- Act always in good faith
- Not knowingly violate any laws, rules, regulations, or policies of the firm
- Not knowingly participate in or assist with the violation of such laws, regulations, or policies
- Not knowingly engage in any act of dishonesty, deceit, fraud, or misrepresentation

## SECTION 4

### Potential Conflicts of Interest

The employees and partners of Gosselin Consulting Group LLC are bound by this Code of Ethics and the Investment Advisers Act of 1940 to carry out their duties in the best interest of each individual client, and avoid any compromising influences when making decisions that impact the client. Such influences include relationships with various investment management organizations, regardless of if they have been a client of Gosselin Consulting Group LLC at any point in time.

The following specific policies are designed to address potential conflicts of interests:

- In no way will Gosselin Consulting Group LLC's business relationships with a particular investment management organization influence their decision-making as it relates to the merit of a particular investment product or the recommendation of a particular investment product to a plan sponsor client
- Gosselin Consulting Group LLC's investment research process shall be fair and balanced and not include/exclude investment managers based on existing or potential future business relationships with the firm
- Gosselin Consulting Group LLC's research process will not include a "flag" indicating the nature of the business relationship with a particular manager, so as to avoid influencing inclusion in/exclusion from additional screens
- Gosselin Consulting Group LLC will follow a strict peer review system, requiring at least two employees/partners to review all investment manager recommendations for any client/prospect prior to presentation to the client/prospect
- All Gosselin Consulting Group LLC consulting fees are fixed in nature and are to be billed/paid in hard dollars
- Gosselin Consulting Group LLC will not accept "finder's fees", commissions, "soft dollar" payments, rebates, revenue sharing, or other compensation of any kind
- Requests for additional detail on client relationships, including fees paid to Gosselin Consulting Group LLC by a particular client, shall be directed to the Chief Compliance Officer (CCO) for evaluation — so as to ensure client confidentiality is maintained while providing for complete transparency wherever possible
- Should additional potential conflicts of interest arise during the normal course of business, these conflicts shall be escalated to the CCO for evaluation and inclusion in this Code of Ethics going forward

## SECTION 5

### Confidential Information

#### Client Information

As a matter of the normal course of business, employees/partners of Gosselin Consulting Group LLC may be provided with sensitive information regarding a particular client's business, employees, pending transactions, or other client-related information that is not otherwise publicly known. Under no circumstances will this information be used for personal gain by the firm or its employees/partners ("insider trading"), nor will this information be provided to others for their gain ("tipping"). This information will not be shared outside of the client relationship under any circumstance, unless required by law.

#### Security Information

Through the course of due diligence efforts or occasional project work, employees/partners of Gosselin Consulting Group LLC may receive information relative to a particular security that is not otherwise publicly available. Under no circumstances will this information be used for personal gain by the firm or its employees/partners ("insider trading"), nor will this information be provided to others for their gain ("tipping"). This information will not be shared with outside parties under any circumstance, unless required by law.

All materially relevant non-public information received by Gosselin Consulting Group LLC will be held as confidential and not shared with outside parties unless at the direction of the party in question, or as required by regulatory authorities or law enforcement officials, or otherwise required by any applicable law. All confidential information shall be handled and stored in a manner that prevents the mis-use of such information.

All Gosselin Consulting Group LLC employees/partners are required to sign a Privacy Policy, and all client contracts shall include a Confidentiality Clause and/or separate Confidentiality Agreement, in an effort to further protect sensitive client information. A sample Confidentiality Agreement can be found in Exhibit B of this Code of Ethics.

## SECTION 6

### Personal Securities Trading

#### General

To protect against potential conflict of interest, all employees/partners will be required to submit personal securities holding records for all reportable securities for which they are the beneficial owner to the Chief Compliance Officer (CCO) for review on a periodic basis. A bank statement or brokerage account statement is the preferred form for submission of this information. Personal securities holdings records of the CCO will be reviewed by at least one other partner to ensure compliance with this Code of Ethics.

The term “beneficial owner” in this case is determined by Rule 16a-1(a)(2) of the Securities Exchange Act of 1934, as amended.

“Reportable securities” are defined in Section 202(a)(18) of the Investment Advisers Act of 1940, as amended, excluding the following: 1) direct obligations of the United States Government; 2) bankers’ acceptances, bank certificates of deposit, commercial paper and high quality short-term debt instruments, including repurchase agreements; 3) shares issued by money market funds; 4) shares issued by registered open-end funds (i.e. mutual funds); or 5) shares issued by unit investment trusts that are invested exclusively in one or more of such open-end funds.

#### Initial Reporting

- All future employees and partners must submit a record of all reportable securities for which they are the beneficial owner no later than 10 days following their date of hire.
- This record must have an as-of date of less than 45 days prior to submission.
- As of the date of this Code of Ethics, the Chief Compliance Officer has received a copy of the initial personal securities records of all partners of Gosselin Consulting Group LLC

#### Ongoing Reporting

- As of June and December (month-end) each year, all employees and partners must submit a record of the prior six month’s reportable securities holdings, no later than 45 days following the most recent quarter-end.

#### Review Process

- The CCO will review these records to ensure compliance with this Code of Ethics upon receipt, and maintain records of these reports for a period of ten years.

All records are confidential, unless requested by government agency or as necessitated by a review of employee/partner conduct in accordance with this Code of Ethics.



## **SECTION 7**

### **Other Policies**

#### **Gifts**

In general, employees should not solicit or accept gifts of material value that could influence their decisions on behalf of Gosselin Consulting Group LLC or the firm's clients. Each quarter, each employee and/or partner will submit a gift-log to the Chief Compliance Officer, documenting any gifts given or received for the prior quarter.

#### **Outside Interests & Relationships**

Employees must disclose any material interests or relationships which may present a conflict of interest with Gosselin Consulting Group LLC's business or client relationships to the Chief Compliance Officer (CCO). These interests and relationships include those of a business, financial, and personal nature. In addition, all outside business activities that do not explicitly present a conflict of interest should also be reported to the CCO.

#### **Personal Securities Holdings in Client Stock**

In the event that a partner or employee owns shares of a prospective client's stock in their personal securities account, the client shall be informed of the partner's or employee's position in advance of signing a contract for services. In addition, no partner or employee will purchase shares of a prospective or current client following initial engagement with that client, as defined by a formal Request for Proposal (RFP). All personal securities holdings will be reported to the Chief Compliance Officer every six months, in accordance with the Personal Securities Trading section of this Code of Ethics. If an employee or partner is an owner of the client's publicly traded stock prior to the date of the formal RFP, the employee and/or partner is permitted to retain their current position or sell that position prior to execution of the client contract, if desired, at their sole discretion.

## **SECTION 8**

### **Violations**

#### Reporting of Violations

Any violation of this Code of Ethics should be immediately reported to the Chief Compliance Officer (CCO). All reports of potential violation by a third-party are confidential. Any suspected violation of the Code of Ethics by the CCO should be brought to the attention of the other partners of the firm by the suspecting partner/employee and reported as necessary to the SEC or FINRA.

#### Record of Violations

The CCO will maintain a record of all violations of the Code of Ethics.

#### Enforcement Actions

Any violation of this Code of Ethics is grounds for disciplinary action up to and including termination of employment by Gosselin Consulting Group LLC. Violations may be referred by the CCO to the SEC or FINRA for appropriate civil or criminal action.

## **SECTION 9**

### **Training**

#### **Initial**

The Code of Ethics shall be distributed to all employees and partners upon being hired by Gosselin Consulting Group LLC. Each employee and partner will be required to read and sign the Code of Ethics in the company of the Chief Compliance Officer (CCO), ensuring their ability to have questions answered by the CCO at that time.

#### **Annual**

The Chief Compliance Officer (CCO) will annually review the Code of Ethics with all employees and partners of the firm. Special attention will be paid to recent and/or proposed updates and/or amendments at that time. Any material changes to the Code of Ethics will require re-signature by all employees and partners.

#### **On-Going**

The CCO will make him/herself available to assist employees/partners with questions they have about the Code of Ethics at any time. As necessary/appropriate (i.e. after a material update/amendment), ad hoc review of the Code of Ethics by every employee may be required by the CCO.

**SECTION 10**

**Review, Amendment, and Record Keeping**

**Review**

This Code of Ethics shall be reviewed periodically (at least annually) by the Chief Compliance Officer (CCO).

**Amendment**

Upon review by the CCO, the Code will be updated or amended as necessary. Any amendments or updates will require re-circulation of the Code of Ethics to all employees and partners of the firm for their signature.

**Record Keeping**

The CCO will require Gosselin Consulting Group LLC to maintain record of this Code of Ethics as set forth by Rule 204-2(a)(12) and (13) under the Advisers Act.