

DIAS WEALTH, LLC

AGREEMENT TO ABIDE BY THE WRITTEN POLICY ON INSIDER TRADING

Name: Carlos Dias Jr.

(Please print)

The Company forbids any officer, director, employee or investment adviser representative from trading, either personally or on behalf of others, on material non-public information or communicating material non-public information to others in violation of the Insider Trading and Securities Fraud Enforcement Act of 1988. This conduct is frequently referred to as "insider trading." This policy applies to every officer, director, employee and investment adviser representative and extends to activities within and outside the scope of their duties at the Company. This "*Agreement to Abide by the Written Policy of the Company on Insider Trading*" must be read and signed by every officer, director, employee and registered representative.

The term "*insider trading*" is not defined in the federal securities laws, but generally is used to refer to the use of material non-public information to trade in securities (whether or not one is an "insider") or to the disclosure of material non-public information to others.

While the law concerning insider trading is not static, it is generally understood that the law prohibits:

- Trading by an insider on the basis of material non-public information;
- Trading by a non-insider on the basis of material non-public information, where the information either was disclosed to the non-insider in violation of an insider's duty to keep it confidential or was misappropriated;
- Communicating material non-public information to others.

The elements of insider trading and penalties for engaging in such conduct are discussed below. If you have any questions concerning this policy statement, please consult with the Company's Compliance Officer.

Who is an Insider?

The term "insider" is broadly defined. It includes the officers, directors, investment adviser representatives and employees of a company. In addition, a person can be a "temporary insider" if they enter into a special confidential relationship in the conduct of a company's affairs and, as a result, are given access to information solely for that company's purposes. A temporary insider can include, among others, a company's attorneys, accountants, consultants, bank lending officers, and the employees of such organizations. In addition, our Company may become a temporary insider of a client we advise or for which we perform other services. If a client expects our Company to keep the disclosed non-public information confidential and the relationship implies such a duty, then our Company will be considered an insider.

WHAT IS MATERIAL INFORMATION?

Trading on insider information is not a basis for liability unless the information is material. "Material information" generally is defined as information that a reasonable investor would most likely consider important in making their investment decisions, or information that is reasonably certain to have a substantial effect on the price of a company's securities, regardless of whether the information is related directly to that company's business. Information that officers, directors, employees and registered representatives should consider material includes, but is not limited to: dividend changes; earnings estimates; changes in previously released earnings estimates; significant merger or acquisition proposals or agreements; major litigation; liquidation problems; and, extraordinary management developments.

What is Non-public Information?

Information is non-public until it has been effectively communicated to the marketplace. For example, information found in a report filed with the SEC, or appearing in Dow Jones, Reuters Economic Services, The Wall Street Journal or other publications of general circulation would be considered public information.

Penalties for Insider Trading

Penalties for trading on or communicating material, non-public information are severe, both for individuals involved in such unlawful conduct and their employers. A person can be subject to some or all of the penalties described below even if they do not personally benefit from the activities surrounding the violation. Penalties include: civil injunctions; treble damages; disgorgement of profits; jail sentences; fines for the person who committed the violation of up to three times the profit gained or loss avoided, whether or not the person actually benefited; and, fines for the employer or other controlling person of up to the greater of \$1,000,000 or three times the amount of the profit gained or loss avoided.

In addition, any violation of this policy statement can be expected to result in serious sanctions by the Company, including dismissal of the persons involved.

Implementation of Insider Trading Policy

The following procedures have been established to aid the officers, directors, employees and investment adviser representatives of the Company in avoiding insider trading violations. Every officer, director, employee and registered representative must follow these procedures or risk serious sanctions, including dismissal, substantial personal liability and criminal penalties.

A. Identification of Insider Information

Before trading for yourself or others, including investment companies or private accounts managed by the Company, or in the securities of a company about which you may have potential insider information, ask yourself the following questions:

1. **Material.** Is the information material? Is this information that an investor would consider important in making an investment decision? Is this information that would substantially affect the market price of the securities if generally disclosed?
2. **Non-Public.** Is the information non-public? To whom has this information been provided? Has the information been effectively communicated to the marketplace by being published in publications of general circulation?

B. Additional Procedures.

If, after consideration of the above, the information is material and non-public, or if further questions arise as to whether the information is material and non-public, the following procedures must be followed:

1. Report the matter immediately to the Compliance Officer of the Company.
2. Do not purchase or sell the securities on behalf of yourself or others, including accounts managed by the Company.
3. Do not communicate the information inside or outside the Company other than to the Compliance Officer of the Company.
4. After the Compliance Department of the Company has reviewed the issue, you will be instructed as to the proper course of action to take.

C. Personal Securities Trading

1. All officers, directors, employees and registered representatives of the Company are required to submit to the Compliance Department, a report of every securities transaction involving them, their families (including spouse, minor children and adults living in the same household), and any trust of which they are trustees or in which they have a beneficial interest or are parties, within ten (10) days after the end of the calendar quarter in which the transactions were effected. This report shall include the names of the securities, dates of the transactions, quantities, prices and broker/dealer through which the transactions were effected. This requirement may be satisfied by submitting copies of confirmations or account statements accompanied by a signed and dated notice of submission.

2. Any transactions by an officer, director, employee or investment adviser representative (including their related parties) through a broker/dealer, investment advisory firm or clearing firm, other than the Company, shall be reported to the Company within ten (10) days after such transactions are effected and such report shall include: the names of the securities; dates of the transactions; quantities; prices; and, the broker/dealer or other entity through which the transactions were effected. This requirement may be satisfied by submission of duplicate confirmations accompanied by a signed and dated notice of submission.

D. Restricting Access to Material Non-Public Information

Information in your possession that you identify as material and non-public may not be communicated to anyone, including persons within the Company except as provided herein. Care should be taken to keep such information secure, including the sealing of files containing material non-public information.

E. Resolving Issues Concerning Insider Trading

If at any time you are in doubt as to whether information is material or non-public, or if you have any unresolved questions as to the applicability or interpretation of the foregoing procedures, or as to the propriety of any action, it must be discussed with the Company's Compliance Department before trading or communicating the information to anyone.

Acknowledgment

I have read, and I understand the foregoing procedures and will comply in all respects with such procedures.



Signature

01/01/2021
Date



Compliance Officer Signature

01/01/2021
Date