

# **Insider Trading Policy**

## **Corvum Investment Management, LLC**

**July 21, 2021**

With a view to uphold its Code of Conduct, Corvum Investment Management, LLC (CIM) forbids all personnel, either personally or on behalf of others, to trade on material nonpublic information or to communicate material nonpublic information to others in violation of the law. In addition, CIM discourages its personnel from seeking or knowingly obtaining material, nonpublic information.

Guidance provided by CFA Institute for its Standard II(A) Material Nonpublic Information in the Institute's Code of Ethics and Standards of Practice shall also offer guidance for CIM's Insider Trading Policy.