

Nantucket Companies

Code of Ethics

We are here to serve our clients first and foremost !

We strive to serve our clients with the highest level of personal and professional service.

Our goal is to preserve, protect and grow the assets of our clients.

Client information is privileged and confidential and is shared only as detailed in our Privacy Policy. Confidentiality of our clients is paramount to our business.

We recognize that each of our clients has unique goals and needs. Our investment recommendations are made with careful consideration of each client's objectives. Where there are extraordinary tax and estate issues, we encourage the participation of the client's accountant and/or attorney.

We are committed to disclose all potential conflicts of interest to prospects and our clients. (see various ADVs and disclosure statements)

Performance reporting by all Nantucket entities is done with consistency. Any changes in our reporting will be fully disclosed and communicated to our clients.

In order to serve our clients, we must be profitable in order to attract and retain the best and brightest employees.

We are a compassionate employer, treating all employees with integrity and respect with total commitment to fair employment.

We educate all of our employees with the most updated compliance policies and procedures, as required by the SROs who govern us.

Nantucket Companies maintain "Personal Securities Transactions and Outside Business Activity" Policies and Procedures. Pertinent highlights are as follows:

- All employees are prohibited from buying and selling equity securities for their personal accounts (with the exception of liquidating legacy positions).
- Certain other securities transactions (such as mutual funds, fixed income, private placements) are permitted.
- All employee related securities transactions (except mutual funds) must be pre-approved by Chief Compliance Officer.
- All security transactions for clients will receive best execution price relative to all employee trades in same security on same date.
- All employee related securities accounts must have duplicate confirmations and monthly statements supplied directly by the Custodian.
- Annual updates are required of all employee outside business activity, employee related securities accounts and outside private investments.
- No employee shall buy or sell securities for employee related portfolios, or for the portfolios of others, where his/her decision is influenced by non-public information.
- Direct outside hedge fund investments are prohibited by employees.

All proprietary Nantucket fund transactions (buys and sells) by employees must be pre-approved by Libby Greenstone. No employee shall act upon and benefit from information available to them which is not made available to fund investors regarding the various Nantucket funds or the underlying fund managers.

We operate with the highest degree of integrity and with the highest standards of business conduct.

Any violation of the Nantucket Code of Ethics should be reported promptly to Libby Greenstone, CCO and will be kept strictly confidential.

All policies and procedures are available to our investors or prospective investors upon their request.

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