



StockExec Code of Ethics



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This Code of Ethics applies to all directors, staff or contractors either having contact with clients or in some way aware of information concerning one or more clients. You will read this document and then sign a document acknowledging receipt and your agreement to comply with all terms as a condition of your employment by StockExec.

Standards of Conduct and Compliance with Laws

StockExec has been designed from the beginning to put the needs of clients first. Our ResultsInAdvance fee structure, under which clients must make a stipulated minimum before fees are charged, is an example of that; the company is paid for client results and not for mere activity. As well, at all times all clients maintain 100% control of their assets in their own separate private brokerage account.

All directors, staff members and contractors (hereinafter referred to as staff) who in any way are associated with clients directly or indirectly are charged with making sure within their field of influence that clients are completely satisfied with the services provided by the company.

Unethical or illegal conduct of any sort by staff members or contractors will result at a minimum in dismissal and may result in civil suit if the reputation of StockExec is harmed in any way.

Client Rights to Privacy

Any information attributable to a client or clients must not be divulged to anyone outside StockExec and then only for legitimate internal purposes. The only exceptions are for law enforcement or other governmental authorities in possession of a legitimate subpoena or warrant, or if given permission by the client.

Provision of Investment Advice

No staff member without appropriate license is permitted to give clients advice respecting stocks specific to that client. No buy or sell recommendation may be provided other than of a general nature or directly quoting existing website content or automated recommendations. To do so

would be against regulatory requirements and will be dealt with appropriately.

Information relative to general non-client-specific strategy such as diversification may be given on condition it is in keeping with standard operating suggestions promoted by StockExec and in accordance with standard StockExec methodology and teaching.

Client Trust

A decision by a client to work with StockExec requires a great deal of trust: trust that the system will do what the client expects over time and trust in staff. Fundamental to trust of staff are the untarnished evidence of genuine openness, integrity, honesty and trustworthiness.

For example, if a staff member commits to some type of response or activity, regard that commitment as a sacred trust. If a promised date or time cannot be met, make sure the client is aware of the delay as early as possible but make sure every effort was made to keep the commitment and that the client understands the unvarnished facts. Then find out what can be done to make amends. Always strive to exceed expectations.

A satisfied client is not enough; a delighted client is part-way there; the goal is to have all clients ecstatic.

Client Expectations

Talk is cheap. Part of the recipe for ecstatic clients is the careful management of expectations. For example, where possible under estimate our average annual test results. Those results fluctuate year by year. In addition, test results are in the past; investments are made in the here and now and in different circumstances or conditions. Past test performance is no indicator of what may happen under actual investment conditions in the future.

If you must use numbers to illustrate a point more clearly, try to use a fictitious number (making sure the client understands it is fiction) and use one lower than our tested long-term average.

The average private investor is reported to make between four and six percent including dividends. The Standard & Poor 500 Index averages about 11% long term. The hope for 11% or more with a strategized approach that takes very little work, has built-in safety factors and is for conservative investors with any level of experience or lack of it is quite enough to attract potential clients. If they then get far better results than they expect they become ecstatic clients who tell all their friends.

Building hopes based on numbers that may or may not be attained once in a while is both unethical and short-sighted; it leads to unhappy clients who eventually go elsewhere. They also talk to friends.

Personal Securities Trading

1. StockExec, its directors or staff may buy or sell securities recommended by our automated system and according to the Recommendations made by the system but may not place orders until clients have had the opportunity to view those same Recommendations. That means in practice staff orders should not be entered into a broker dashboard before Sunday in any week leaving all day Saturday clear for clients who wish to enter orders.
2. StockExec does not buy or sell securities on clients' behalf and so there is no opportunity to influence stock prices one way or another. However, all staff members or directors who could potentially have knowledge of any client account must submit to the compliance department copies of their monthly brokerage statements. These statements must be stored securely in the event SEC staff wishes to examine them to identify potential improper trades.