

## **Bulldog Financial Planning LLC Code Of Ethics**

### **Executive Summary including Covered Persons:**

Bulldog Financial Planning LLC is a Single Member Limited Liability Company that is a Registered investment adviser with Rhode Island and Massachusetts State Regulators. This Code of Ethics has been adopted by Bulldog Financial Planning LLC and is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940. This policy describes how Bulldog Financial Planning LLC will operate in a way that will put my client's interests ahead of my own while mitigating the risks of any conflict of interest in the process.

### **Code of Ethics:**

My actions will be based on the core value set of the company which includes:

- 1) Acting in the best interest of the client
- 2) Demonstrate dependability
- 3) Expertise
- 4) Integrity
- 5) Loyalty
- 6) Professionalism
- 7) Continuing Education
- 8) Avoid or disclose and manage conflicts of interest
- 9) Protect the client's information with privacy and confidentiality

### **Standards of Business Conduct**

**Due Diligence:** It is critical to perform due diligence prior to the formulation of a recommendation or any other conclusion.

**Fiduciary Responsibility:** This is at the core of every recommendation and discretionary trading decision.

**Ensuring that special customer requests are followed**

**Putting the customer first**

**Avoid Conflicts of Interests or if this is unavoidable, then fully disclose**



**Professionalism:** Every client will be treated with respect, dignity, and courtesy.

**Continuing Education:** Patrick is an advocate of education and will continue to build on his own knowledge base. This includes ongoing continuing education requirements and enhancing his skills.

**Dependability:** Be there for the client to help them with their goals.

### **Compliance With Securities Laws**

The owner of Bulldog Financial Planning LLC is required to abide by all the applicable federal securities laws. The recommendations, investment strategies including the trades in personal accounts will not:

1. Defraud a client in any manner
2. Mislead a client, including by making any statement that omits material facts
3. Engage in any act, practice or course of conduct that operates or would operate as a fraud or deceit on a client
4. Engage in any manipulative practice with respect to a client
5. Engage in any manipulative practice with respect to securities, including price manipulation
6. Favor the interests of one client over another client
7. Engage in front running, and/or profit personally, directly or indirectly, as a result of knowledge about a security or a transaction

### **Insider Trading**

Bulldog Financial Planning LLC will not perform trades on securities upon being informed of material nonpublic information. The research performed by the firm will rely on publicly available information sources. The business is not affiliated with investment banks, third party research companies, or other companies that may have access to material nonpublic information. The company will maintain a policy and procedure.

### **Protecting the confidentiality of client information**

Bulldog Financial Planning LLC is required to understand customer relationships which means essential facts pertaining to the clients need to be gathered. This information will be collected for the purpose of effectively servicing the client, to act in accordance with any special handling instructions, to understand who has the proper authority, and in order to comply with the



applicable laws, regulations, and rules. In addition, the goal of my company is to ensure compliance with standards set forth in the CFP® code of ethics are maintained which means exercising due care.

Our company is dedicated to protecting this information. This information will remain confidential and will be stored privately using secure methods. Bulldog Financial Planning LLC uses a number of different security methods to protect this information on your behalf.

### **Privacy Policy**

Bulldog Financial Planning LLC will maintain the confidentiality of privacy of customer information. The company has a Privacy Policy in place that will explain how the information collected is used and shared when necessary or by customer request.

### **Personal Securities Transactions**

Every trade that is placed in the personal account of the owner will be recorded and maintained per the policies of the company. These transaction records will detail the purpose of those personal trades. The securities in these trades will be cross referenced against all investment strategies present in customer accounts managed by Bulldog Financial Planning LLC and any other investment recommendations made to clients by BFP. Customer accounts will be reviewed and those trades fitting the customer strategies will be placed first unless there is an exception. The customer follow ups to address changes to investment recommendations will be completed. Steps will be taken to maintain the legitimacy of those strategies and recommendations.

Bulldog Financial Planning LLC will not participate in IPOs or Private offerings in personal accounts or in the discretionary investment accounts. The interest in personal securities will be disclosed to customers of BFP.

### **Personal Securities Holdings**

The owner is the only Access person at Bulldog Financial Planning LLC. The personal account holdings and trade confirmation records will be retained and updated annually each year within a reasonable time after the owner's brokerage statements have been created. This will include detailed holdings for all accounts.

The 'Personal Securities Transaction Records' will be reviewed quarterly in order to determine if changes need to be made to the existing policy and procedures in place or if there could be strategical improvements made to the existing investment strategies and investment recommendations.