

ANNUAL OFFER OF FORM

**ADV
&
CODE OF ETHICS
PRIVACY NOTICE
FIDUCIARY DUTY
CFP® CODE**

Presented by:

**James D. Hallett, President &
Chief Compliance Officer**

Hallett & Associates, P.S.
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Annual Offer

Hallett Advisors files the Form ADV as required by the United States Securities and Exchange Commission (SEC). This registration document is updated annually and throughout the year as material changes occur in our business and services. We are offering you a copy our firm's Part 2 disclosure brochure. **Please let us know if you wish to receive a copy of the firm's Form ADV Part 2. We will be happy to send the document to you, or you may ask to see it the next time you visit our office.**

Code of Ethics

Investment Advisors are required to establish a written Code of Ethics and offer the Code to clients. Hallett Advisors has established a written Code of Ethics and the following is provided for your consideration. We are required to comply with federal and applicable state securities regulations and we take compliance seriously. We require all staff members to immediately report any known or suspected violations of the Advisor's Fiduciary Duties, Code of Ethics, or securities rules and regulations to the Advisor's Chief Compliance Officer (CCO). Failure to report material information will result in loss of authority or termination and possible additional action by a regulator. We abide by honest and ethical business practices which include, but are not limited to:

- We will make investment decisions with reasonable grounds to believe the decisions are suitable for the client on the basis of information furnished by the client and we will document suitability.
- We will not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- We will place discretionary orders only after obtaining clients' authorization as evidenced by our Client Agreement.
- We will never borrow money or securities from, or lend money or securities to a client. We will not accept funds from clients except those representing financial planning or investment advisory services.
- We will not place an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in states where we provide investment advice.
- All access persons will report all personal securities trading for themselves and for beneficial relationships. The CCO is charged with approval and monitoring of personal securities transactions.

Privacy Notice

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need information in order to provide products or services to you. We maintain physical and procedural safeguards to comply with regulatory standards to guard your non-public personal information and ensure our integrity and confidentiality. We will never sell information about you or your accounts. We do not share your information unless it is required to process a transaction at your request or required by law.

CFP® Code of Ethics

One of our staff holds the Certified Financial Planner™ designation (CFP®). The Certified Financial Planner Board of Standards Inc. (CFP Board) also has adopted its own Code of Ethics and Professional Responsibility (Code of Ethics) to provide principles and rules to all persons whom it has recognized and certified to use the CFP®, Certified Financial Planner™ and certification marks (collectively “the marks”). The CFP Board determines who is certified and thus authorized to use the marks. Implicit in the acceptance of this authorization is an obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. The CFP® Code of Ethics’ Principles express the profession’s recognition of its responsibilities to the public, to clients, to colleagues and to employers. They apply to all CFP Board designees and provide guidance to them in the performance of their professional services. You are welcome to request a copy of the CFP® Code of Ethics.

Fiduciary Duty

Hallett & Associates is a fiduciary to every client. The SEC takes the position that Advisors owe their clients several specific duties as fiduciaries and these include:

- ◆ Advice that is suitable;
- ◆ Full disclosure of material facts and potential conflicts of interest;
- ◆ Utmost and exclusive loyalty and good faith;
- ◆ Best execution of transactions;
- ◆ Advisor’s reasonable care to avoid ever misleading clients;
- ◆ Acting only in the best interest of clients.

We pledge to exercise best efforts always to act in good faith and in the best interests of our clients. And, we will act as a fiduciary. We will provide written disclosure, in advance, of any conflicts of interests that could reasonably compromise the impartiality of our advice. Moreover, in advance, we will disclose any and all compensation we will receive as a result of the services we provide. We recognize that you rely upon us, and are compensating us for trustworthy advice.