

RBC Wealth Management Investment Advisor Code of Ethics

RBC Wealth Management is committed towards ensuring that, in our capacity as an investment advisor, we:

- Act in the best interests of our clients and not allow personal interests or those of the organization to take precedence over the interest of our clients;
- Act with due skill, care and diligence in conducting our business and all transactions and trading activities;
- Preserve client confidentiality at all times;
- Respect the intellectual property rights of others;
- Prevent and/or fully disclose any perceived or real conflicts of interest;
- Protect and promote the integrity of the market; and
- Preserve honesty, integrity, and trust in all communications with clients, employees, and shareholders.

OBJECTIVES OF THE CODE OF ETHICS

- To encourage and foster an organizational and work environment that prompts the internal reporting through a defined escalation path regarding violations of our Code of Ethics as related to securities transactions, personal trading activities of employees and supervisory personnel, employee behavior, and the RBC Code of Conduct;
- To promote compliance with applicable securities laws, rules, and regulations through leveraging an ethically-based approach;
- To promote honest and ethical conduct by all employees, Financial Advisors, and executives, including the ethical management of actual or apparent conflicts of interest between external, personal and professional relationships;
- To promote full, fair, accurate, and understandable disclosure in reports, documents, and client communications that we create, submit, and disseminate; and
- To establish accountability on the part of employees, Financial Advisors, and executives regarding adherence to our Code of Ethics.

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