

**CODE OF ETHICS OF
THE NATIONAL FEDERATION OF MUNICIPAL ANALYSIS**

Municipal analysts should conduct themselves with integrity and dignity and act in an ethical manner in their dealings with the public, clients, customers, employees, and fellow analysts.

Municipal analysts should practice municipal analysis in a professional and ethical manner and encourage others to do so in order to reflect credit on themselves and their profession.

Municipal analysts should strive to maintain and improve their competence and that of others in the profession.

Municipal analysts should use proper care and exercise independent professional judgment.

Members of the National Federation of Municipal Analysts are obligated to conduct their professional activities in accordance with the following specific provisions:

I. OBLIGATION TO INFORM EMPLOYER OF CODE

Municipal analysts shall inform their employer, through their direct supervisor, that they are obligated to comply with the Code of Ethics.

II. COMPLIANCE WITH GOVERNING LAWS AND REGULATIONS AND THIS CODE OF ETHICS.

A. Required Knowledge and Compliance.

Municipal analysts shall maintain knowledge of and shall comply with all applicable laws, rules and regulations of any government, governmental agency, and regulatory organization governing their professional activities, as well as with this Code of Ethics.

B. Prohibition Against Assisting Legal and Ethical Violations

Municipal analysts shall not knowingly participate in, or assist, any acts in violation of any statute or regulation governing securities matters, nor any act which would violate any provision of the Code of Ethics.

C. Responsibilities of Supervisors

Municipal analysts with supervisory responsibility shall exercise reasonable supervision over those subordinate employees subject to their control, to prevent any violation by such persons of applicable statutes, regulations, or provisions of the Code of Ethics. In so doing, analysts are entitled to rely upon reasonable procedures established by their employer.

III. RESEARCH REPORTS, INVESTMENT RECOMMENDATIONS AND ACTIONS

A. Reasonable Basis

Municipal analysts shall exercise diligence and thoroughness in making an investment recommendation to others or in taking an investment action for others.

Municipal analysts shall have a reasonable and adequate basis for such recommendation and actions, supported by appropriate research and investigation.

Municipal analysts shall maintain appropriate records to support the reasonableness of such recommendations.

B. Research Reports

Municipal analysts shall use reasonable judgment as to the inclusion of relevant factors in research reports.

Municipal analysts shall distinguish between facts and opinions in research reports.

Municipal analysts shall indicate the basic characteristics of the investment involved when preparing for general public distribution a report that is not directly related to a specific portfolio or client.

C. Portfolio Investment Recommendations and Actions

Municipal analysts shall, when making investment recommendation or taking an investment action for a specific portfolio or client, consider its appropriateness and suitability for such portfolio or client. In considering such matters, the municipal analyst shall take into account (a) the needs and circumstances of the client, (b) the basic characteristics of the total portfolio, and (c) the basic characteristics of the investment involved. Municipal analysts shall use reasonable judgment and opinions in the presentation of investment recommendations.

D. Prohibition Against Plagiarism

Municipal analysts shall not, when presenting material to their employer, associates, customers, clients, or the general public, copy or use in substantially the same form, material prepared by other persons without acknowledging its use and identifying the name of the author or publisher of such materials. Analysts, however, use without acknowledgment factual information published by recognized financial and statistical reporting services or similar sources.

E. Prohibition Against Misrepresentation

Municipal analysts shall not make any statements, orally or in writing, which materially misrepresent (a) the services that the analysts or their firm is capable of performing for the client, (b) the qualifications of such analysts or their firm, (c) the investment performance that the analysts or their firm has accomplished or can reasonably be expected to achieve for the client, or (d) the expected performance of any investment. Municipal analysts shall not make any unsupported statements regarding the foregoing, and shall not make any statement, orally or in writing, about any investment which guarantees or conveys any unsupported assurances, explicitly or implicitly.

F. Fair Dealing with Customers and Clients

Municipal analysts shall act in a manner consistent with their obligation to deal fairly with all customers and clients when (a) disseminating investment recommendations, (b) disseminating material changes in prior investment advice, an (c) taking investment action.

IV. PRIORITY OF TRANSACTIONS

Municipal analysts shall conduct themselves in such a manner that transactions for their customers, clients, and employer have priority over personal transactions and so that their personal transactions do not operate adversely to their interests. If analysts decide to make a recommendation about the purchase or sale of a security they shall give their customers, clients, and employer adequate opportunity to act on this recommendation before acting on their own behalf.

V. DISCLOSURE OF CONFLICTS

Municipal analysts, when making investment recommendations, or taking investment actions, shall disclose to their customers and clients any material conflict of interest relating to them and any material beneficial ownership of the securities involved, which could reasonably be expected to impair their ability to render unbiased and objective advice.

Municipal analysts shall disclose to their employer all matters which could reasonably be expected to interfere with their duty to the employer, or with their ability to render unbiased and objective advice.

Municipal analysts shall also comply with all requirements as to disclosure of conflicts of interest imposed by law and by rules and regulations of organizations governing their activities and shall comply with any prohibitions on their activities if a conflict of interest exists.

VI. RELATIONSHIPS WITH OTHERS

A. Preservation of Confidentiality

Municipal analysts shall preserve the confidentiality of information communicated by the client concerning matters within the scope of the confidential relationship, unless the municipal analyst receives information concerning illegal activities on the part of the client.

B. Maintenance of Objectivity

Municipal analysts, whether individually or as a member of a group, shall use particular care and good judgment to achieve and maintain objectivity.