



UNIQUE
INVESTMENTS

code of ethics



CODE OF ETHICS

The partners at Arbtrust Venture LLC. (“Managers”) strive to create and maintain a culture where all those who have a position, function, position, employment, commercial, professional, contractual or trust relationships with the Company are able to witness a solid expansion of our business and the exercise of our code of ethics as interconnected factors.

This Code of Ethics ("the Code") aims to establish the rules, principles, concepts and values that should guide the ethical standard of conduct of the Employees in their internal performance and with the financial and capital markets, as well as in their relations with the various investors and the general public.

STANDARDS OF CONDUCT

All employees, contractors and related business must:

- **Be respectful.** Although opinions may differ, it is important to remain civil and respectful. Work together to foster a productive environment where everyone is allowed to have an opinion without repercussions.
- **Be inclusive.** We are welcoming of people from all backgrounds on our team, including members of any race, ethnicity, culture, class, orientation, education, age, size, family status, political or religious beliefs and mental and physical ability.
- **Be considerate.** Treat others how you would like to be treated in the workplace. Each person on this team is important and essential, and each person’s decisions and actions affect our outcomes and morale.
- **Be professional.** Conducting yourself professionally includes being kind to others. Maintain professional interactions when communicating with others at all times.
- **Be honest and transparent.** We are dedicated to the full disclosure of our professional life and activities.
- **Aim for excellence, always.** It is important to achieve for excellence in everything it is done, even the small things. To strive for a better work environment will ensure a greater customer experience.
- **Be accountable** for shortcomings or mistake. We take actions and strive to deliver excellence and we commit to hold ourselves accountable for any action that the person we are morally responsible for. Accepting accountability if there is any harm caused includes righting unintentional wrongs.
- **Know and understand their obligations** towards the Manager, as well as the legal rules that regulate them, in order to avoid any practices that infringe or conflict with the rules and principles contained in this Code and in the regulations in force;
- **Perform activities with transparency** and in compliance with the laws and determinations of the supervisory and inspection bodies of the sector in which they operate
- **Help the Manager** to perpetuate and demonstrate the values and principles set forth herein
- **Identify, manage and mitigate** possible conflicts of interest, in the respective spheres of our activity that may affect the impartiality of the people that perform functions related to resource management;



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- **Consolidate our reputation** as an customer centered avant-grade high-tech company, keeping it complete and solid, strengthening its corporate institutional image;
- **Work according to the principles** of moral and professional integrity;
- **Care for the business as their own company**, taking responsibility and being proactive.
- **Act guided by the principles of freedom** of initiative and free competition, avoiding the adoption of practices that characterize unfair competition and/or unfair conditions, respecting the principles of the free market;
- Immediately inform the Manager of any situation that he/she deems to merit greater scrutiny.

Our team believes in strength in diversity. Every person has a different perspective and valuable input to offer, whether it's solving a problem or contributing to new ideas. Not understanding someone's perspective does not mean that their view is incorrect. Remember to keep the focus on creative resolutions and continuous learning.

The Manager has adopted the standards of conduct described above to create a work environment free from discrimination of any kind, including moral, sexual or other types of harassment in the workplace.

Relationship with the Media

The Manager sees in the media a relevant channel of information for the various segments of the Manager and is open to meeting their requests, whenever possible and there are no legal or strategic obstacles, which will be explained to journalists when they occur. The Manager's representatives before any means of communication are exclusively its managing partners, indicated in the company's article of incorporation, who may delegate this function whenever they deem appropriate. The other Employees may only provide information to third parties in general (including, but not limited to, matters related to the Manager's activities), reporters, interviewers or journalists with the express authorization of the Manager. Additionally, notwithstanding the foregoing, Employees must respect customers, competitors, suppliers, regulatory and governmental bodies.



ARBTRUST

Arbtrust LLC is a Company based in Florida. Any prospective investors that wish to subscribe units of the Arbtrust LLC operations should contact us through the contact form. This website is not an offer to buy or sell, nor is it a solicitation of an offer to buy or sell, the Units or any other security or to participate in any advisory services or trading strategy. Any offering or solicitation will be made only to certain qualified investors who are "accredited investors" as defined under Regulation D of the Securities Act, and any investments by U.S. persons will only be permitted to potential investors who demonstrate that status. Investors in the Shares must have the financial ability, sophistication, experience, and willingness to bear the risks of such investment. Arbtrust Venture LLC (the "fund") operates pursuant to SEC rule 506(b) of regulation D. The membership interests of the fund have not been registered under the securities act of 1933 (the "securities act"), or the securities laws of any state. Historical returns, economic, market or other performance it is not an indication of future results. Potential investors must have the financial ability, sophistication, experience, and willingness to bear the risks of an investment. Any potential investments made in the company involve risk. Potential investors should carefully consider the long term nature of an investment in the Units prior to making an investment decision. Units of the company are not insured by the FDIC.