

# **Bionic Capital LLC**

## **Code of Ethics**

This Code of Ethics is established to ensure that Bionic Capital LLC, a registered investment advisor in the State of Florida, adheres to the highest standards of integrity, professionalism, and fiduciary responsibility. It is designed to comply with the requirements set forth under Florida Securities law (Chapter 517, Florida Statutes) and applicable federal laws and regulations.

### **1. Fiduciary Duty**

At Bionic Capital LLC, we are committed to acting in the best interests of our clients at all times. As fiduciaries, we:

Place the client's interests ahead of our own and any other third parties.

Avoid conflicts of interest whenever possible, and fully disclose any potential or actual conflicts to clients in a timely manner.

Provide advice that is aligned with the client's investment objectives, financial circumstances, and risk tolerance.

### **2. Disclosure Obligations**

Bionic Capital LLC ensures that our clients receive full and fair disclosure regarding:

All material facts related to any investment strategies or securities being recommended.

Our fee structures, including any commissions, and other forms of compensation or remuneration received by related parties.

Any conflicts of interest or potential conflicts arising from our firm's activities.

### **3. Confidentiality of Client Information**

Bionic Capital LLC upholds the confidentiality of all client information, ensuring that:

Client financial and personal information, investment activities, and sensitive data are protected.

Client information is only disclosed when required by law or with the client's explicit consent.

### **4. Compliance with Laws and Regulations**

Bionic Capital LLC adheres to:

All federal and state securities laws, including the Investment Advisers Act of 1940, and Florida's Chapter 517 regulations.

Regulatory standards set forth by the SEC, FINRA, and any other applicable agencies.

Florida-specific rules, including registration, annual filings, and continuing education obligations.

## **5. Prohibition of Insider Trading**

Bionic Capital LLC and its employees are prohibited from engaging in insider trading or using nonpublic, material information for personal or client advantage in the purchase or sale of securities.

## **6. Fair Dealing**

Our firm is dedicated to ensuring fair dealing with all clients by:

Treating all clients equitably in the execution of transactions and distribution of information.

Avoiding favoritism and ensuring that no client is given preferential treatment over another.

## **7. Avoidance of Conflicts of Interest**

At Bionic Capital LLC, we strive to avoid conflicts of interest wherever possible. If conflicts are unavoidable, we:

Disclose all conflicts to clients in a clear and timely manner.

Ensure that any action taken remains in the client's best interest and not for the benefit of our firm or third parties.

## **8. Advertising and Marketing Standards**

All advertising and marketing activities conducted by Bionic Capital LLC will:

Be accurate, truthful, and not misleading in any way.

Disclose all relevant risks associated with the investment products or strategies being promoted.

Comply with the guidelines of the Florida Office of Financial Regulation and the SEC.

## **9. Personal Trading and Reporting**

Bionic Capital LLC requires that all employees:

Avoid personal trading that could result in conflicts of interest with clients.

Report personal securities transactions to ensure compliance with our fiduciary duty and legal obligations.

## **10. Record Keeping**

Bionic Capital LLC maintains accurate records, including:

Client agreements, trade confirmations, and account statements.

All communications between the firm and its clients, including emails, recommendations, and meeting notes.

Any records required under federal or Florida law, such as Form ADV and financial statements.

## **11. Supervision**

Our firm has implemented a comprehensive compliance program designed to supervise our employees and ensure adherence to this Code of Ethics. This includes:

Regular monitoring of adherence to legal and regulatory standards.

Ongoing training of employees on ethical conduct, applicable laws, and Bionic Capital LLC's internal policies.

## **12. Duty to Report Violations**

Any employee or advisor of Bionic Capital LLC who becomes aware of a violation of this Code of Ethics or any applicable law must promptly report the matter to the firm's designated compliance officer or appropriate regulatory authorities.

## **13. Sanctions for Violations**

Violations of this Code of Ethics by any member of Bionic Capital LLC will result in:

Internal disciplinary actions, which may include suspension or termination of employment.

Regulatory penalties, fines, or sanctions from state or federal authorities.

Potential civil or criminal liability.

## **14. Annual Compliance Review**

Bionic Capital LLC conducts an annual review of this Code of Ethics to ensure ongoing compliance. This review ensures:

All disclosures to clients are current, accurate, and comprehensive.

Compliance policies are functioning effectively and meet regulatory requirements.

## **15. Ethical Duty to Clients and the Profession**

As representatives of Bionic Capital LLC, all employees and advisors are expected to uphold the highest standards of professionalism, integrity, and respect for the trust placed in us by our clients. This commitment is central to maintaining the reputation and ethical standing of our firm and the investment advisory profession.

## **16. Effective Date**

This Code of Ethics is effective immediately and is binding on all employees, advisors, and representatives of Bionic Capital LLC.