

Code of Ethics - March 2019

Parish & Company strives to maintain the highest level of ethical conduct as represented by the following key parameters:

1) No fees are accepted from any investment company on any client. No 12B1, no soft dollar arrangements, trading commission allocations, no free trips, etc. Clients instead pay a flat .75 percent of assets and receive a written guarantee that no such fees are accepted.

2) Only established companies, funds and fixed income investments that trade on established exchanges are recommended. No aggressive trading is conducted, no initial public offerings, no hedge funds, no private equity, no options and no margin lending. With respect to fixed income, generally only government backed treasuries, both domestic and foreign, are recommended. An example of foreign fixed income would be Canadian treasuries.

3) Clients are apprised of all purchases and sales prior to transactions being placed. The objective here is to make sure clients maintain a sense of control and discretion with respect to all activity. Parish & Company can manage all details of such transactions once approval is obtained. Focusing on well diversified low cost investment is a primary focus.

4) Client asset accounts are only maintained at high quality publicly traded brokerage firms, including TD Ameritrade, Vanguard, Fidelity, TIAA-CREF and Charles Schwab. These firms are regularly reviewed from an operational standpoint with the objective of making sure clients assets are maintained at only the highest quality firms. Clients also have complete on-line access to their accounts and are able to conduct transactions, if they so wish, by themselves. Parish & Company does however receive duplicate copies of all transactions and related statements.

5) Key corporate governance issues are advanced via writing specialized articles for a variety of publications ranging from Barrons to Bloomberg. These have included reviewing proxy firms, mergers, specialized tax issues, capital adequacy and various other financial and corporate governance related topics.