

## Gerrish Financial Code of Ethics

### **Conflicts of Interest**

Gerrish Financial LLC seeks to avoid material conflicts of interest. Accordingly, neither Gerrish Financial LLC nor its investment adviser representatives receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees), additional services (e.g, educational conferences), or non-direct monetary or other forms of compensation (e.g., entertainment events) from brokerage firms (custodians) or mutual fund companies.

Although Gerrish Financial LLC believes that its business methodologies, ethics rules, and adopted practices are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain, clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest.

### **Our Code of Ethics**

Gerrish Financial LLC has adopted a Code of Ethics to which all employees are bound to adhere. Our Code of Ethics states:

Gerrish Financial LLC and its investment advisor representatives and employees shall always:

- As a fiduciary, act in the best interests of each and every client
- Act with integrity and dignity when dealing with clients, prospective clients, and others
- Strive to maintain and continually enhance our high degree of professional education regarding all aspects of personal financial planning
- Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients

### **Participation or Interest in Client Transactions and Personal Trading**

Gerrish Financial LLC does not participate in securities in which it has a material financial interest. Gerrish Financial LLC and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or its related persons has a material financial interest. Individuals associated with our firm may buy or sell securities for their personal accounts identical or different than those recommended to clients. However, it is the expressed policy of our firm that no person employed by the firm shall prefer his or her own interest to that of an advisory client nor make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with the Code of Ethics, anyone associated with this advisory practice and who possesses access to advisory recommendations (before or at the time they are entered into) ("access persons") is required to provide annual securities holding reports and quarterly transaction reports to Gerrish Financial LLC's owner or his designee. Access persons are also required to receive advance approval from Gerrish Financial LLC's owner or his designee prior to investing in any initial public offerings or private placements, and with regard to trading of certain individual securities.

Gerrish Financial LLC further prohibits the use of material non-public information and protecting the confidentiality of client information. All individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to disciplinary action.