

OCTOBER 2022

As a fiduciary, Christopher Weil & Company, Inc. (“WEIL”) has a duty of utmost good faith to act solely in the best interests of each of our clients. Our clients entrust us with their funds, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all registered persons, employees and affiliates to act with the utmost integrity in all of our dealings. This fiduciary duty is the core principle underlying this Code of Ethics and represents the expected basis of all of our dealings with our clients.

The WEIL Code of Ethics has been established to set forth the culture of ethics at WEIL and its affiliates and to prevent fraud by reinforcing the fiduciary principles that must govern the conduct of our firm. The WEIL Code of Ethics strives to deter fraud and any wrongdoing by requiring:

Standards of Conduct which place clients’ interests ahead of employees’, require employees to always act in the best interest of the client, govern employee trades to avoid actual or perceived conflicts of interest and prevent employees from taking advantage of their position in the firm and ensure that employees strictly adhere to all securities laws.

Protection of Material Non-Public Information by requiring employees to exercise diligence and care in maintaining and protecting our clients’ non-public, confidential information.

Personal Conduct Standards holding employees to the highest ethical practices by placing restrictions and review requirements on the acceptance of gifts, outside business interests and activities and service as a director for an outside business or non-profit, both public and private.

Record Keeping that includes historical copies of employee securities transactions, account statements and confirmations, historical copies of written approval to participate in IPOs and private placements and historical copies of employees’ written agreement to the Code of Ethics.

Whistle-blowing provisions that require all employees to report violations of the policy, with the explicit understanding that no ill effects will befall any employee who reports violations in good faith.

Sanctions outlining the consequences of violating the Code of Ethics including disgorgement of profits, reversal of affected trades and, if warranted, termination of employment and/or relationship with WEIL.

Distribution of the Code to ensure that all directors, officers, registered personnel and employees of WEIL and/or its affiliates sign the WEIL Code of Ethics and Personal Trading Policy as acknowledgment, verification of completeness and accuracy and acceptance of all terms and conditions, at least annually. Additionally, a written copy of WEIL’s Code of Ethics and Personal Trading Policy is available to clients, prospective clients and interested persons upon request.

WEIL strives at all times to adhere to SEC compliance-related directives and other requirements in all jurisdictions in which we do business. To ensure the high ethics of WEIL are maintained, in some situations, WEIL standards exceed what is legally required.