

## We are Pleased to Announce that Vansant Mewshaw Claims Compliance with the CFA Institute's Asset Manager Code of Professional Conduct and Listed on the CFA Website.

As a Fee-Only, Registered Investment Advisor, with fiduciary, we have adhered to these principles from our inception. We have now been afforded the opportunity to be recognized by one of the most prestigious and respected organizations for investment professionals and listed on their website.



### ASSET MANAGER CODE OF PROFESSIONAL CONDUCT

The Asset Manager Code of Professional Conduct outlines the ethical and professional responsibilities of firms ("Managers") that manage assets on behalf of clients. By adopting and enforcing a code of conduct for their organizations, Managers demonstrate their commitment to ethical behavior and the protection of investors' interests.

#### GENERAL PRINCIPLES OF CONDUCT

Managers have the following responsibilities to their clients.

- Managers must:
1. Act in a professional and ethical manner at all times.
  2. Act for the benefit of clients.
  3. Act with independence and objectivity.
  4. Act with skill, competence, and diligence.
  5. Communicate with clients in a timely and accurate manner.
  6. Uphold the applicable rules governing capital markets.

#### ASSET MANAGER CODE OF PROFESSIONAL CONDUCT

##### A. LOYALTY TO CLIENTS

Managers must:

1. Place client interests before their own.
2. Preserve the confidentiality of information communicated by clients within the scope of the Manager-client relationship.
3. Refuse to participate in any business relationship or accept any gift that could reasonably be expected to affect their independence, objectivity, or loyalty to clients.

##### B. INVESTMENT PROCESS AND ACTIONS

Managers must:

1. Use reasonable care and prudent judgment when managing client assets.
2. Not engage in practices designed to distort prices or artificially inflate trading volume with the intent to mislead market participants.
3. Deal fairly and objectively with all clients when providing investment information, making investment recommendations, or taking investment action.
4. Have a reasonable and adequate basis for investment decisions.

5. When managing a portfolio or pooled fund according to a specific mandate, strategy, or style:
  - a. Take only investment actions that are consistent with the stated objectives and constraints of that portfolio or fund.
  - b. Provide adequate disclosures and information so investors can consider whether any proposed changes in the investment style or strategy meet their investment needs.
6. When managing separate accounts and before providing investment advice or taking investment action on behalf of the client:
  - a. Evaluate and understand the client's investment objectives, tolerance for risk, time horizon, liquidity needs, financial constraints, any unique circumstances (including tax considerations, legal or regulatory constraints, etc.) and any other relevant information that would affect investment policy.
  - b. Determine that an investment is suitable to a client's financial situation.

[www.cfainstitute.org](http://www.cfainstitute.org)

From the CFA Institute's website:

The Code outlines the ethical and professional responsibilities of firms that manage assets on behalf of clients. It provides standards and supportive guidance based on general principles of conduct.

It states that managers have these responsibilities to their clients

- To act in a professional and ethical manner at all times
- To act for the benefit of clients
- To act with independence and objectivity
- To act with skill, competence, and diligence
- To communicate with clients in a timely and accurate manner
- To uphold the rules governing capital markets

Currently there are over 1,300 firms that claim compliance with the *Asset Manager Code of Professional Conduct* in the United States...we are proud to be one of them.

Please see the below link for your reference:

[http://www.cfainstitute.org/ethics/codes/assetmanager/Pages/firms\\_claiming\\_compliance.aspx](http://www.cfainstitute.org/ethics/codes/assetmanager/Pages/firms_claiming_compliance.aspx)

Vansant Mewshaw claims compliance with the CFA Institute Asset Manager Code of Professional Conduct. This claim has not been verified by CFA Institute.