

MCD Advisors
Marie DeCaprio CFA, CFP ®

Code of Ethics for MCD Advisors, LLC, (“Advisor”)

Advisor operates as a fiduciary in all dealings with clients. Clients’ interest comes before the interest of Advisor in all matters. As such, no conflicts of interest can exist between clients and Advisor.

Principle 1 – Integrity

Advisor shall offer and provide professional services with integrity.

Advisor recognizes clients place Advisor in a position of trust and confidence. Integrity demands honesty and candor, which must not be subordinated to personal gain and advantage. Within the characteristic of integrity, allowance can be made for innocent error and legitimate difference of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity

Advisor shall be objective in providing professional services to clients.

Objectivity requires intellectual honesty and impartiality. It is an essential quality for any professional. Advisor shall provide the highest level of work, maintain objectivity, and avoid subordination of his or her judgment that would violate this Code.

Principle 3 – Competence

Advisor shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which Advisor is engaged.

One is competent only when he or she has attained and maintained an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation or client referral is appropriate. In addition to assimilating the common body of knowledge required and acquiring the necessary experience, Advisor shall make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness

Advisor shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers and shall disclose conflict(s) of interest(s) in providing such services.

Fairness requires impartiality, intellectual honesty, and disclosure of conflict(s) of interest(s). It involves a subordination of one's own feelings, prejudices, and desires so as

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to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 – Confidentiality

Advisor shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process, to defend against charges of wrongdoing by the Advisor or in connection with a civil dispute between Advisor and client.

A client, by seeking the services of Advisor, may be interested in creating a relationship of personal trust and confidence with Advisor. This type of relationship can only be built upon the understanding that information supplied to Advisor or other information will be confidential. In order to provide the contemplated services effectively and to protect the client's privacy, Advisor shall safeguard the confidentiality of such information.

Principle 6 – Professionalism

Advisor's conduct in all matters shall reflect credit upon the profession.

Because of the importance of the professional services rendered by Advisor, there are attendant responsibilities to behave with dignity and courtesy to all those who use those services, fellow professionals, and those in related professions.

Principle 7 – Diligence

Advisor shall act diligently in providing professional services.

Diligence is the provision of services in a reasonably prompt and thorough manner. Diligence also includes proper planning for and supervision of the rendering of professional services.

This MCD Advisors, LLC Code of Ethics was derived from the FPA Code of Ethics.