



# JM BROWN FINANCIAL PARTNERS

## CODE OF ETHICS

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J M Brown Financial Partners' Code of Ethics applies to all full and part-time Employees of J M Brown Financial Partners. The purpose of this Code of Ethics is to promote honest and ethical conduct and compliance with the law. All employees of the firm are required to conduct their personal and professional affairs in a manner that is consistent with the ethical and professional standards set forth in this **Code of Ethics**.

All employees must:

- Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. We always work with the customers' interests in mind, and partner with them directly to provide sound financial solutions over their lifetimes.
- Act in good faith, responsibly, with due care, competence, prudence and diligence, without misrepresenting material facts or allowing one's independent judgment or decisions to be subordinated.
- Comply with governmental laws, rules and regulations, of federal, state and local governments and other appropriate regulatory agencies.
- Respect for privacy is necessary to build strong business relationships. We accumulate a considerable amount of information about our clients and we are required to keep confidential any of this information. We should collect, use or disclose personal information only with the knowledge and permission of the person to whom the information relates unless otherwise permitted by local laws. In certain jurisdictions where we conduct our business, our customers have the right to ask if we hold any personal information about them and, if so, to review it. They may also have the right to know how we collected the information, how we use it, and to whom we have disclosed it.

Investment Adviser Representatives ("IARs") of J M Brown Financial Partners are registered and licensed professionals providing investment advisory services covering a diverse spectrum of financial vehicles as outlined in Item 8 and Item 11 of the Disclosure Brochure. This includes the placement of the properly selected financial product as individual client conditions warrant.



All prospective clients will be given J M Brown Financial Partners' Code of Ethics along with its Disclosure Brochure at the initial meeting. Clients will be able to receive these documents anytime thereafter upon request.

Ethical conduct is the hallmark of any profession. This is especially true in the financial services industry. Since investment advisors function in an arena of primary importance, they are subject to extensive regulation. However, these laws, rules and regulations provide only the base or foundation for proper conduct. Professional conduct is defined not by reference to regulatory dictates, but rather by moral and ethical standards.

Clients do business when they trust the advisor. They trust the advisor when they believe he/she is listening to their needs and has those needs at heart when making recommendations. Each employee of the advisor must be convinced that his/her self-interest is best served by placing the customer's interests before his own. This is in the highest and best tradition of fiduciary conduct, a tradition which J M Brown Financial Partners expects its employees to uphold.

Three basic principles apply:

- *We will conduct every aspect of our business in a fair, lawful, and ethical manner.*
- *We will offer our customers only products and services that are appropriate to their needs and provide fair value.*
- *We will maintain a climate that encourages every IAR to be honest and fair in the conduct of his or her duties.*

Since a company operates entirely through the people it employs, the responsibility for ethical conduct rests with those individuals. J M Brown Financial Partners expects all IARs and other employees to comply with the law, both when acting on behalf of J M Brown Financial Partners, and in their personal conduct. Beyond that, in gray areas not covered by laws or regulations, we expect every IAR to conduct him/herself in an ethical and fair manner.

### **Confidentiality**

Our business requires that we obtain financial and other personal information about our customers and clients. Thus, we have an obligation to respect our customers and clients' privacy rights by keeping this information confidential. In general, unauthorized or improper disclosures are potential liabilities for the Company. More importantly, success in our business depends on our clients' trust that we will properly utilize information they confide in us.

To help maintain a business environment worthy of our clients' trust, you should follow these rules:



- a. Request and use only that information which is related to our business needs.
- b. Limit use and discussion of information obtained on the job to normal business activities. Do not discuss sensitive information in elevators, restaurants, social gatherings or other public places.
- c. Use passwords, code names or numbers for sensitive projects.
- d. Include only pertinent and accurate data in files that are used as a basis for sensitive decision-making. Exercise care to avoid placing documents containing sensitive information in areas where they may be read by unauthorized persons. These documents must be stored in secure locations when they are not in use.
- e. Restrict access to records to those with proper authorization and legitimate business needs. To the extent possible, restrict access to departmental areas where sensitive information could be obtained or overheard to only those IARs with a valid business purpose for being in the area.
- f. Maintain the confidentiality of clients' identities.

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Signed & date