



Tim J. Newell and Harvest Investment code of Ethics and Best Practices

Fiduciary - Legal duty to act solely in the best interest of another

I, (Advisor), and Harvest Investment Services, LLC will exercise best efforts as a fiduciary, acting in good faith and in the best interests of (Mr. & Mrs. Client) at all times. Adhering to the following fiduciary standards set forth.

Serve the Financial Interests of Clients First

- We shall always place the financial interests of the client first. All recommendations to clients and decisions on behalf of clients shall be solely in the best interest of the client.

Act with Prudence

- We will act with care, skill, prudence, loyalty and diligence. We have a responsibility to make clients financial goals and objectives a priority. All recommendations will assist clients in reaching their financial goals.

Provide Material Information

- Provide to clients all material information related to the investment decision-making process as well as other information they may need to make informed decisions based on realistic expectations

Maintain Competency

- We will maintain competency in investment management consulting and financial services through education and training to better serve clients and enhance investment management consulting.

Best Execution

- We will seek the best net price and terms available, in such a manner that the client's total costs or proceeds in each transaction is most favorable under the circumstances.

Avoid Conflict of Interest

- We will perform our services fair to all clients. We will always disclose conflicts of interests

I (Advisor), shall act in a Fiduciary Capacity, in your best interest and always put your interest ahead of my own and Harvest Investment Services, LLC.

(Advisor), CFP®, AIF®

Dated