Fiduciary Policy Effective 02/16/2025

At Applewood Capital Management Associates, LLC, we are committed to upholding the highest standards of fiduciary responsibility in serving our clients. Our fiduciary duty is the cornerstone of our relationship with clients, and we pledge to:

- 1. Always act in the best interests of our clients, placing their goals and objectives above our own.
- 2. Provide full and fair disclosure of all material facts, including potential conflicts of interest.
- 3. Exercise the utmost care, skill, and diligence in managing client assets and providing investment advice.
- 4. Maintain strict confidentiality of all client information.
- 5. Provide personalized advice tailored to each client's unique financial situation and investment objectives.
- 6. Regularly monitor and review client portfolios, making adjustments as necessary to align with their goals.
- 7. Avoid all practices that could be considered deceptive, manipulative, or fraudulent.
- 8. Maintain a written code of ethics that all supervised persons must adhere to.
- 9. Implement robust compliance procedures to ensure adherence to all applicable securities laws and regulations.
- 10. Continuously educate our staff on fiduciary responsibilities and ethical practices.
 - We recognize that our fiduciary duty extends to all aspects of our advisory relationship with clients. We are committed to serving as trusted stewards of our clients' financial well-being and will always prioritize their interests above all else.