

CODE OF ETHICS

Andy Millard Advisory, LLC

March 15, 2021

Introduction

This is the Code of Ethics (the "Code") of Andy Millard Advisory, LLC (the "Firm"). The Firm's Policies on Insider Trading and Personal Securities Transactions are included in the Code.

Important Considerations About This Code

- Terms in bold face have special meaning in this Code. Please refer to the definitions below.
- All Access Persons must complete three Reporting Forms under this Code. Additional information regarding these Reporting Forms can be found below. Copies of the Reporting Forms are included at the end of the Code or copies can be obtained from the Compliance Officer.
- The Compliance Officer has the authority to grant written waivers of the provisions of this Code in appropriate instances. However:
 - the Firm expects that waivers will be granted only in rare instances, and
 - some provisions of the Code that are mandated by law cannot be waived.
- For purposes of this Code, all beneficial owners of the Firm are considered an Associated Person of the Firm.
- The Firm's management will review the terms and provisions of this Code at least annually and make amendments as necessary. Any amendments will be distributed to all Associated Persons of the Firm, and each Associated Person must provide in writing their receipt, understanding, and acceptance of the changes.
- If there is any doubt or uncertainty about what this Code requires or permits, ask the Compliance Officer. Please do not guess the answer.

General Principles

The Firm is a fiduciary for its investment advisory clients. Because of this fiduciary relationship, it is generally improper for the Firm or its Associated Persons to:

- use for their own benefit (or the benefit of anyone other than the client), to the detriment of the client, information about the Firm's trading or recommendations for client accounts; or
- take advantage of investment opportunities that would otherwise be available for the Firm's clients.

Also, as a matter of business policy, the Firm wants to avoid even the appearance that the Firm, its Associated Persons, or others receive any improper benefit from information about client trading or accounts or from our relationships with our clients or with the brokerage community.

The Firm expects all Associated Persons to comply with the spirit of the Code, as well as the specific rules contained in the Code.

The Firm treats violations of this Code (including violations of the spirit of the Code) very seriously. Violation of either the letter or the spirit of this Code, may result in the Firm taking disciplinary measures, including, without limitation, imposing penalties or fines, reduction of compensation, demotion, requiring unwinding of the trade, requiring disgorgement of trading gains, suspending or terminating of employment, or any combination of the foregoing.

Improper trading activity can constitute a violation of this Code. Nevertheless, the Code can be violated by failing to file required reports, or by making inaccurate or misleading reports or statements concerning trading activity or securities accounts. Individual conduct can violate this Code even if no clients are harmed by such conduct.

Definitions

These terms have special meanings in this Code of Ethics:

Supervised Person - This term includes employees, directors, officers, and partners of the Firm, as well as any other person occupying a similar status or performing similar functions. The Firm may also include in this category all temporary workers, consultants, independent contractors, and anyone else designated by the Compliance Officer. For purposes of the Code, such 'outside individuals' will generally only be included in the definition of a supervised person, if their duties include access to certain types of information, which would put them in a position of sufficient knowledge to necessitate their inclusion under the Code. The Compliance Officer shall make the final determination as to which of these are considered supervised persons.

Access Person - An Access Person is a Supervised Person who has access to nonpublic information regarding any client's purchase or sale of securities, is involved in making securities recommendations to clients, or has access to such recommendations that are nonpublic. All of the Firm's directors, officers, and partners are presumed to be Access Persons.

Associated Person - For purposes of this Code, all Supervised Persons and Access Persons are collectively referred to as 'Associated Persons'.

Advisory Client - Any person to whom or entity to which the Firm serves an investment adviser, renders investment advice, or makes any investment decisions for a fee is considered to be a client.

Beneficial Ownership - means any opportunity, directly or indirectly, to profit or share in the profit from any transaction in securities, including those owned by members of an Access Person's immediate family living in the Access Person's household, as defined below.

Person Responsible for Compliance - means the Compliance Officer, Andrew Millard, or another person that has been designated to perform such functions when the Compliance Officer is not available.

Covered Securities - means anything that is considered a "security" under the Investment Firm Act of 1940. This is a very broad definition of security. It includes most kinds of investment instruments, including things that one might not ordinarily think of as "securities," such as:

- exchange traded funds;
- options on securities, on indexes and on currencies;
- investments in all kinds of limited partnerships;
- investments in foreign unit trusts and foreign mutual funds; and
- investments in private investment funds and hedge funds.

If there is any question or doubt about whether an investment is a considered a security or a Covered Security under this Code, ask the Compliance Officer.

Non-Reportable Securities - Rule 204A-1 does not require access persons to report:

- Direct Obligations of the US Treasury;
- Bankers' acceptance, certificates of deposit, commercial paper, and high quality short-term debt obligations, including repurchase agreements;
- Money market fund shares;
- Shares of open end mutual funds, unless the Company or a control affiliate acts as the investment adviser or principal underwriter for the fund;
- Shares issued by unit investment trusts that are invested exclusively in unaffiliated mutual funds;
- Securities held in accounts over which the access person had no direct or indirect influence or control; or

- Transactions effected pursuant to an automatic investment plan.

Members of the Family/Household include:

- A spouse or domestic partner (unless they do not live in the same household as the Access Person and the Access Person does not contribute in any way to their support);
- Children under the age of 18;
- Children who are 18 or older (unless they do not live in the same household as the Access Person and the Access Person does not contribute in any way to their support); and
- Any of the people who live in the Access Person's household: including, stepchildren, grandchildren, parents, stepparents, grandparents, brothers, sisters, in-laws, and adoptive relationships.

Guidelines for Professional Standards

- At all times, all Associated Persons must comply with applicable federal securities laws and must reflect the professional standards expected of those engaged in the investment advisory business, and they shall act within the spirit and the letter of the federal, state, and local laws and regulations pertaining to investment advisers and the general conduct of business. These standards require all personnel to be judicious, accurate, objective, and reasonable in dealing with both clients and other parties so that his or her personal integrity is unquestionable.
- All Associated Persons are required to report any violation of the Code, by any person, to the Compliance Officer or other appropriate persons of the Firm immediately. Such reports will be held in confidence.
- Associated persons must place the interests of Advisory Clients first. All Associated Persons must scrupulously avoid serving his or her own personal interests ahead of the interests of the Firm's Advisory Clients. In addition, Associated Persons must work diligently to ensure that no client is preferred over any other client.
- All Associated Persons are naturally prohibited from engaging in any practice that defrauds or misleads any client, or from engaging in any manipulative or deceitful practice with respect to clients or securities.
- No Associated Person may serve on the board of directors of any publicly traded company without prior written permission from the Compliance Officer.
- Associated persons must conduct all personal securities transactions in full compliance with this Code. Doubtful situations should be resolved in favor of Advisory Clients and in cooperation with the Compliance Officer. Technical compliance with the

Code's provisions shall not automatically insulate from scrutiny any securities transactions or actions that could indicate a violation of the Firm's fiduciary duties.

- Personal transactions in securities by Access Persons must be transacted to avoid even the appearance of a conflict of interest on the part of such personnel with the interests of the Firm's clients. Likewise, Associated Persons must avoid actions or activities that allow (or appear to allow) a person to profit or benefit from his or her position with the Firm at the expense of clients, or that otherwise bring into question the person's judgment.
- The Firm has adopted Insider Trading Policies that set parameters for the establishment, maintenance, and enforcement of policies and procedures to detect and prevent the misuse of material nonpublic information.
- Associated persons are prohibited from accepting compensation for services from outside source without the specific prior written permission of the Compliance Officer.
- When any Associated Person faces a conflict or potential conflict between his or her personal interest and the interests of clients, he or she is required to immediately report the conflict to the Compliance Officer for instructions regarding how to proceed.
- The recommendations and actions of the Firm are confidential and private matters. Accordingly, we have adopted a Privacy Policy to prohibit the transmission, distribution, or communication of any information regarding securities transactions in client accounts or other non-public information, except to broker/dealers or other bona fide service providers in the ordinary course of business. In addition, no information obtained during the course of employment regarding particular securities (including internal reports and recommendations) may be transmitted, distributed, or communicated to anyone who is not affiliated with the Firm, without the prior written approval of the Compliance Officer.
- No Associated Person may accept or receive on his or her own behalf, or on behalf of the Firm, any gift or other accommodation, which has a value in excess of \$100.00 from any vendor, broker, securities sales representative, client, or prospective client (a "business contact") - per business contact per year. All gifts or other accommodations, which have a value in excess of \$100.00 received by Associated Persons or their Family/Household from a business contact, must be immediately reported to the Compliance Officer.
- No Associated Person may give on their own behalf, or on behalf of the Company, any gift or other accommodation to a business contact, which has a value in excess of \$100.00, without prior written approval from the Compliance Officer.

Policies regarding gift receipt/giving are not intended to prohibit normal business entertainment or customary meals.

Personal Trading Policies

The following policies and procedures apply to all accounts owned or controlled by an Access Person, and any account in which the Access Person has any direct or indirect Beneficial Ownership. These accounts are collectively referred to as "Covered Accounts." Any account in question should be addressed with the Compliance Officer immediately to determine if it is considered a covered account.

Reporting Requirements

All Access Persons must file the reports described below, even if there are no holdings, transactions, or accounts to list in the reports. Copies of all reporting forms may be obtained from the Compliance Officer.

Initial Holdings Reports

No later than 10 calendar days after an Associated Person becomes an Access Person (or within 10 days of the adoption of this Code if the Associated Person was already an Access Person at the time of its adoption), that Access Person must file an Initial Holdings Report with the Compliance Officer.

The Initial Holdings Report requires that each Access Person list all Covered Accounts on the date the Associated Person became an Access Person. It also requires each Access Person to list all brokers, dealers, and banks holding any accounts, in which the Access Person had direct or indirect Beneficial Ownership, on the date the Associated Person became an Access Person (or on the date this Code was adopted, if the Associated Person was already an Access Person on such date).

This requirement may be satisfied by instructing the custodian for these accounts to send duplicate confirmations and brokerage account statements for the Covered Accounts to the Firm, c/o the Compliance Officer, provided all required information is included in the report. Alternatively, Access Persons may submit this information on the Reporting Form provided by the Firm.

Each Access Person must notify the Compliance Officer of any updates or changes to his or her Covered Accounts within 10 days of such update or change. All information contained in the holding report must be current as of the date no more than 45 days prior to the date the report is submitted.

The Initial Holdings Report also requires each Access Person to confirm that he or she has read and understands this Code, and that he or she understands that it applies to all accounts

containing securities in which the Access Person has Beneficial Ownership ("Covered Accounts").

Quarterly Transaction Reports

No later than 30 calendar days after the end of March, June, September, and December, each year, each Access Person must file a Quarterly Transaction Report with the Compliance Officer.

The Quarterly Transaction Report requires each Access Person to list all transactions in Covered Accounts during the most recent calendar quarter in which the Access Person had Beneficial Ownership. It also requires the Access Person to list all brokers, dealers, and banks holding any Covered Accounts in which such person had direct or indirect Beneficial Ownership during the quarter. This requirement may be satisfied by instructing the custodian for these accounts to send duplicate confirmations and brokerage account statements for the Covered Accounts to the Firm, c/o the Compliance Officer, provided all required information is included in the report. Alternatively, Access Persons may submit this information on the Reporting Form provided by the Firm.

Annual Holdings Reports

By January 31 of each year, each Access Person must file an Annual Holdings Report with the Compliance Officer.

The Annual Holdings Report requires the Access Person to list all securities in Covered Accounts in which the Access Person had Beneficial Ownership as of December 31 of the previous year. It also requires the Access Person to list all brokers, dealers, and banks holding any accounts in which such person had direct or indirect Beneficial Ownership on December 31 of the previous year. This requirement may be satisfied by instructing the custodian for these accounts to send duplicate confirmations and brokerage account statements for the Covered Accounts to the Firm, c/o the Compliance Officer, provided all required information is included in the report. Alternatively, Access Persons may submit this information on the Reporting Form provided by the Firm. All information contained in the holding report must be current as of the date no more than 45 days prior to the date the report is submitted.

The Annual Holdings Report also requires each Access Person to confirm that he or she has read and understands this Code, has complied with its requirements, and that he or she understands that it applies to Covered Accounts held by him or her and members of his or her Family/Household.

Review and Recordkeeping

The Compliance Officer shall review personal trading reports for all Access Persons no less than quarterly, and will otherwise take reasonable steps to monitor compliance with, and enforce this Code of Ethics. Evidence of the reviews shall be maintained in the Firm's files. Another qualified individual will review the Compliance Officer's personal securities trading reports.

The Firm reserves the right to require the Access Person to reverse, cancel, or freeze, at the Access Person's expense, any transaction or position in a specific security if the Firm believes the transaction or position violates its policies or appears improper. The Firm will keep all such information confidential except as required to enforce this policy or to participate in any investigation concerning violations of applicable law.

If the Firm discovers any trading activity that appears to be in violation of this policy, the Compliance Officer, and/or other senior representatives of the Firm, will meet with the Access Person to review the findings and to discuss additional pertinent information related to the situation. Where necessary, one or more of the following remedial actions may be taken:

- Written warning that will be made a permanent part of the Access Person's record;
- Disgorgement of profits;
- Monetary fine; and/or
- Termination of employment.

Prohibited and Restricted Transactions

- Access Persons may not acquire any Beneficial Ownership in any security (not just Covered Securities) in an initial public offering without first seeking written approval from the Compliance Officer.
- Purchases and sales of restricted securities issued by public companies are generally prohibited, unless the Compliance Officer determines that the contemplated transaction will raise no actual, potential, or apparent conflict of interest.
- Any Access Person wishing to purchase or sell a security obtained through a private placement, including purchase of any interest in a hedge fund, must first seek written approval by the Compliance Officer. In addition, if an Associated Person who owns a security in a private Firm knows that the Firm is about to engage in an IPO, he or she must disclose this information to the Compliance Officer.
- Participation in Investment Clubs must be approved in writing by the Compliance Officer in advance of any such participation.

Timing of Personal Transactions

If the Firm is purchasing/selling or considering for purchase/sale any Covered Security on behalf of a Client Account, no Access Person may effect a transaction in that Covered Security prior to the client purchase/sale having been completed by the Firm, or until a decision has been made not to purchase/sell the Covered Security on behalf of the Client Account and in accordance with the Firm's pre-clearance and blackout policy, if any.

Case-by-Case Exemptions

Because no written policy can provide for every possible contingency, the Compliance Officer may consider granting additional exemptions from the Prohibitions on Trading on a case-by-case basis. Any request for such consideration must be submitted by the Access Person in writing to the Compliance Officer. Exceptions will only be granted in those cases in which the Compliance Officer determines that granting the request will create no actual, potential, or apparent conflict of interest.

Pre-clearance

Access Persons are prohibited from engaging in any transaction in a Covered Security in any account in which the Access Person has any Beneficial Ownership, unless the Access Person obtains pre-clearance for that transaction in advance of the transaction. Pre-clearance of requested trades is evidenced by the signed approval of the compliance officer.

If pre-clearance is obtained, the approval is valid for the day on which it is granted and the immediately following business day. The Compliance Officer may revoke a pre-clearance any time after it is granted and before the transaction is executed. The Compliance Officer may deny or revoke pre-clearance for any reason. In no event will pre-clearance be granted for any Covered Security if the Firm has a buy or sell order pending for that same security or a closely related security (such as an option relating to that security, or a related convertible or exchangeable security), unless in accordance with the Firm's policy on timing of personal securities transactions.

INSIDER TRADING POLICIES

The purpose of these policies and procedures (the "Insider Trading Policies") is to educate our Associated Persons regarding insider trading, and to detect and prevent insider trading by any person associated with the Firm. The term "insider trading" is not defined in the securities laws, but generally, it refers to the use of material, non-public information to trade in securities or the communication of material, non-public information to others.

Prohibited Activities

All Associated Persons of the Firm, including contract, temporary, or part-time personnel, or any other person associated with the Firm are prohibited from the following activities:

- trading or recommending trading in securities for any account (personal or client) while in possession of material, non-public information about the issuer of the securities; or
- communicating material, non-public information about the issuer of any securities to any other person.

The activities described above are not only violations of these Insider Trading Policies, but also may be violations of applicable law.

Reporting of Material, Non-Public Information

Any Associated Person who possesses or believes that she/he may possess material, non-public information about any issuer of securities must report the matter immediately to the Compliance Officer. The Compliance Officer will review the matter and provide further instructions regarding appropriate handling of the information to the reporting individual.

Definitions

Material Information. "Material information" generally includes:

- any information that a reasonable investor would likely consider important in making his or her investment decision; or
- any information that is reasonably certain to have a substantial effect on the price of a company's securities.

Examples of material information include the following: dividend changes, earnings estimates, changes in previously released earnings estimates, significant merger or acquisition proposals or agreements, major litigation, liquidation problems and extraordinary management developments.

Non-Public Information. Information is "non-public" until it has been effectively communicated to the market and the market has had time to "absorb" the information. For example, information found in a report filed with the Securities and Exchange Commission, or appearing in Dow Jones, Reuters Economic Services, The Wall Street Journal, or other publications of general circulation would be considered public.

Insider Trading. While the law concerning "insider trading" is not static, it generally prohibits: (1) trading by an insider while in possession of material, non-public information; (2) trading by non-insiders while in possession of material, non-public information, where the information was either disclosed to the non-insider in violation of an insider's duty to keep it confidential or was misappropriated; and (3) communicating material, non-public information to others.

Insiders. The concept of "insider" is broad, and includes all Associated Persons of a Firm. In addition, any person may be a temporary insider if she/he enters into a special, confidential relationship with a Firm in the conduct of a Firm's affairs and as a result has access to information solely for the Firm's purposes. Any person associated with the Adviser may become a temporary insider for a Firm it advises or for which it performs other services. Temporary insiders may also include the following: a Firm's attorneys, accountants, consultants, bank lending officers and the Associated Persons of such organizations.

Penalties for Insider Trading

The legal consequences for trading on or communicating material, non-public information are severe, both for individuals involved in such unlawful conduct and their employers. A person can be subject to some or all of the penalties below even if he/she does not personally benefit from the violation. Penalties may include:

- civil injunctions
- jail sentences
- revocation of applicable securities-related registrations and licenses
- fines for the person who committed the violation of up to three times the profit gained or loss avoided, whether or not the person actually benefited; and
- fines for the Associated Person or other controlling person of up to the greater of \$1,000,000 or three times the amount of the profit gained or loss avoided.

In addition, the Firm's management will impose serious sanctions on any person who violates the Insider Trading Policies. These sanctions may include suspension or dismissal of the person or persons involved.

Sanctions

All disciplinary responses to violations of the Code shall be administered by the CEO. Determinations regarding appropriate disciplinary responses will be administered on a case-by-case basis.

Certification

Upon the Firm's adoption of this Code and annually thereafter, all Associated Persons are required to certify in writing his or her understanding and continuing acceptance of, as well as agreement to abide by, the guidelines and polices set forth herein. Additionally, any change or modification to the Code will be distributed to all Associated Persons and they will be required to certify in writing their receipt, understanding, and acceptance of the change(s).

ASSOCIATED PERSONS AS OF MARCH 15, 2021

Name	Title	Acknowledgment of receipt of Code of Ethics	Access Person?
Carl Andrew Millard	Principal	3/18/2021	Yes
Sharon Gail Millard	Accounting & Client Service	3/18/2021	Yes

AGREEMENT TO ABIDE BY CODE OF ETHICS

This agreement is entered into by and between Andy Millard Advisory, LLC (the "Firm") and the Associated Person whose name and signature is represented below.

By signing this agreement, I, _____, acknowledge that:

_____ I have received a copy of the Firm's Code of Ethics;

_____ I have read and understand the information contained in the Code of Ethics;

and, _____ I will abide by the Code of Ethics and any subsequent amendments thereto.

To comply with the personal securities transactions reporting policy and the Firm's Code of Ethics, I further certify that I have directed each broker with whom I have an account to send to the Firm's designated Chief Compliance Officer duplicate copies of all periodic statements relating to my accounts or have otherwise complied with the reporting requirements of the policy and the Firm's Code of Ethics.

Signature _____

Date _____

INITIAL HOLDINGS FORM

To: Compliance Officer, Andy Millard Advisory, LLC

From: _____ (Access Person - Please Print)

NOTE: IN LIEU OF THIS REPORT, YOU MAY SUBMIT DUPLICATE COPIES OF YOUR BROKERAGE STATEMENTS

Re: Report of Personal Securities Holdings:

As of, _____, 20____, I hold the following securities:

Date Security Bought/Sold # of Shares Price Broker

* Use additional sheet(s), if necessary.

As of _____, 20____, I do not have any direct or indirect Beneficial Ownership in any securities. Beneficial interest is understood to mean securities transactions in the accounts of my spouse, minor children, or other family members residing in my household. However, I agree to promptly notify Andy Millard Advisory, LLC's designated Chief Compliance Officer if I open such an account as long as I am employed by Millard & Firm.

Signed: _____

Date: _____ Report reviewed

by: _____ Date: _____

QUARTERLY EMPLOYEE TRANSACTION SUMMARY

Access Person/Associate: _____

QUARTER (circle one) 1st 2nd 3rd 4th YEAR _____

Please list the securities you or your spouse have bought or sold since the last quarterly report. If you have no security transactions, please check the appropriate box. You need not report transactions in mutual funds or government securities.

I have reportable trades and I am attaching brokerage statement(s) in lieu of filling out the form.

How many statements are attached? _____

During the above period I made no reportable trades in my personal brokerage account or in any account in which I have a direct or indirect beneficial interest. Beneficial interest is understood to mean securities transactions in the accounts of my spouse, minor children, or other family members residing in my household.

During the above period I did not open any personal securities brokerage account that I have not disclosed to Andy Millard Advisory, LLC.

I do not currently have a personal securities brokerage account. However, I agree to promptly notify Andy Millard Advisory, LLC if I open such an account, for so long as the said Firm employs me.

Name of Security	Amount	Price Executed	Broker	Buy/Sell	Trade Date

Signed: _____ Date: _____

Report reviewed by: _____ Date: _____

ANNUAL CERTIFICATION OF COMPLIANCE

With The Personal Securities Transactions Disclosure Requirements And Code Of Ethics For Andy Millard Advisory, LLC

In accordance with the policies and procedures regarding Personal Securities Transactions and the Code of Ethics for Andy Millard Advisory, LLC, I certify that during the year ended as of December 31, _____:

1. I have fully disclosed all Covered Securities holdings in which I have Beneficial Ownership.
2. I have obtained pre-clearance for all Covered Securities transactions in which I have Beneficial Ownership, except for transactions exempt from pre-clearance, or for which I have received a written exception from the Compliance Officer.
3. I have reported all Covered Securities transactions in which I have Beneficial Ownership, except for transactions exempt from reporting, or for which I have received a written exception from the Compliance Officer.
4. I have complied with the Code of Ethics in all other respects.

Print Name: _____

Signature: _____ Dated: _____, 20_____

ANNUAL PERSONAL SECURITIES HOLDINGS REPORT

To: Chief Compliance Officer, Andy Millard Advisory, LLC

From: _____ (Access Person - Please Print)

Re: Report of Personal Securities Holdings:

As of _____, 20____, I have already disclosed securities accounts maintained by me or by any member of my immediate family or household to Millard & Firm, and any new account information is attached to the back of this certificate.

As of _____, 20____, I do not have any direct or indirect Beneficial Ownership in any securities. Beneficial interest is understood to mean securities transactions in the accounts of my spouse, minor children, or other family members residing in my household. However, I agree to promptly notify Millard & Firm if I open such an account for as long as the said Firm employs me.

Signed: _____ Date: _____

Report reviewed by: _____ Date: _____