

Code of Business Conduct and Ethics

Purpose

Beacon Investment Management (The Company) is committed to conducting business with honesty, competence, and integrity. Compliance with the law is fundamental to the ethical and business principles of Beacon Investment Management.

The following policies have been adopted by Beacon pursuant to paragraphs (a) (1), (2), (4) and (5) of Rule 204A-1 under the Investments Advisors Act of 1940 with the objective of deterring wrongdoing and to provide standards of ethical and honest conduct. The following policies are set forth to provide guidance to officers and employees and in addition ensure they act in accordance with not only these but also the spirit of the laws and regulations that apply to the Company's business.

Annual Review

Each Officer, and employee shall provide written acknowledgment annually that they have read and understand this Code and it's contents and they have not violated the Code, and are not aware that any other Officer, or employees has violated this Code.

Compliance with Laws, Rules and Regulations

This Conduct and Code of Ethics applies to each and every employee, and officer. All employees and officers are expected to read these policies, comply with them and acknowledge such in writing. The compliance officer, Patricia Hall will administer and interpret this Code as well as implement rules and procedures to promote its effectiveness. The activities of Beacon must at all times be in full compliance with all rules, regulations and laws of the jurisdictions in which the Company conducts business. All employees and officers are expected to fully comply with this Code. Any questions regarding compliance with any laws, rules or regulations should be directed to the Compliance Officer.

As a registered investment adviser, Beacon is subject to regulation by the Securities and Exchange Commission, and compliance with federal, state, and local laws.

Conflicts of Interest

No employee or officer will have a "conflict of interest" with Beacon Investment Management. A "conflict of interest" exists when a person's private interest interferes, or even appears to interfere, with the interest of Beacon Investment Management. Some types of transactions and/or relationships that might cause a conflict of interest and that should be considered are:

1. Favoring the interests of one client over another or favoring larger accounts over smaller accounts.
2. Use or disclosure of confidential information for personal profit by any employee or officer.

3. Competing with client trades, and using that knowledge to profit personally, directly or indirectly, as a result of such transactions, including by purchasing or selling such securities.

The above list is only a guide in identifying potential conflicts of interest. A review will be done on any circumstances that could possibly be deemed as a conflict of interest. All employees and officers are required to promptly make full and fair disclosure of any matter that could be expected to impair their objectivity or interfere with duties to Beacon, its clients, or prospective clients to the compliance office including any transaction or relationship that could be deemed as a conflict. Every employee and officer is expected to avoid any outside activity, financial interest or relationship that may present a possible conflict of interest. No employee or officer may engage in any activity that involves any conflict except with specific prior approval in accordance with procedures set out in this Code and the Beacon Investment Management Compliance Manual.

Corporate Opportunities

Each Employee and officer is prohibited from

1. Using corporate property, information or position for personal gain
2. Competing with Beacon
3. Taking for themselves personally opportunities that are found through the use of Beacon's property or information, or through their position with Beacon, unless prior approval is given by Beacon's President.
4. Offering, soliciting, or accepting any gifts, benefits, compensation, or consideration that reasonably could be expected to compromise Beacon and/or its clients.

Confidentiality

Employees and officers should maintain confidentiality at all times. Confidential information includes proprietary information of Beacon and its clients, employee data and all other non-public information that might be of use to competitors, or harmful to Beacon and its clients, if disclosed is confidential. This confidential information should be protected at all times, however may be subject to legal or regulatory requirements to disclose that information. In such cases, the President of Beacon will assist in determining what disclosure is required. Confidentiality of information continues after association with Beacon ends.

Fair Dealing

All employees and officers should deal fairly with customers, suppliers, employees, and competitors. No person will take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. The interest of clients is placed first at all times.

Protection and Proper Use of Company Assets

Employees and officers are expected to protect and help ensure the efficient use of Beacon's assets, including trade secrets, proprietary information, equipment and other

property created, obtained or compiled by employment with Beacon. All company assets should be used for a legitimate business purpose as deemed so by the President of Beacon. The misuse or removal from Beacon's facilities of Beacon assets is prohibited, unless specifically authorized by an appropriate representative of Beacon.

Any suspected fraud or theft should be immediately reported to the Compliance Officer or the President.

Personal and Insider Trading

Beacon currently has an insider trading policy which governs its employees and officers. This policy states that employees and officers may not trade in stocks of companies which they may learn material, non-public information through the course of their employment or service. They are also prohibited from passing on such information to others.

Personal trading reports for all access and related persons of Beacon are reviewed daily by the Compliance Officer and are kept monthly. Statements of all holdings for access persons are recorded quarterly and filed at least annually. In addition, it is firm policy that complete reports of securities holdings must be made available and filed at the time there is a new access person, and at least filed annually thereafter.

Any IPO or private placement that may be done by an access person must be pre-approved by Sam Bass, Jr. .

Public Filings and Communications

Beacon Investment Management upholds fair, full, accurate, timely and understandable disclosure for use in any reports and documents that Beacon files with, or submits to, the Securities and Exchange Commission and in other public communications made by Beacon. All employees and officers are expected to communicate whether by email correspondence, reports, or documents; in a fair, accurate, timely and understandable method and must not knowingly make any misleading or misrepresentations regarding investment returns, recommendations, or any other professional activity. The compliance officer or the President of the Company should be consulted prior to any public disclosure of information concerning Beacon. Any questions regarding this should be directed to the compliance officer.

Recordkeeping and Record Retention

Beacon requires honest and accurate recording and reporting of information. Beacon complies with all laws and regulations regarding the preservation of its books, records, account and financial statements, and are all kept for a minimum of five years. Assets of Beacon are carefully and properly accounted for. Any employee or officer making false or misleading records or documentation is strictly prohibited. Beacon does not maintain unrecorded funds or assets. All emails are archived by an outside vendor.

Reporting Violations

All suspected violations of this Code, applicable laws and regulations, or Beacon's other internal policies or procedures must be reported immediately to either the compliance officer or the President. Each employee and officer are encouraged to talk to the compliance officer or the president when in doubt about the best course of action in a particular situation. Employees may make a report anonymously to the compliance officer if they suspect any unlawful or fraudulent activity. Beacon does not permit retaliation of any kind for good faith reports of violations or possible violations. All employees and officers are expected to fully cooperate with any internal investigations or either apparent or actual violations of this Code. All reported violations are immediately investigated, and a record is retained for all investigations, reports, and actions taken.

Penalties

Any employee or officer who violates this Code will be subject to disciplinary action, up to and including dismissal. Violations of some provisions of this Code are illegal and may subject the employee or officer to civil and criminal liability. If there are any questions regarding any information in this Code, they should be directed to the compliance officer.

Waiver

Any waiver of the provisions of this Code for executive officers of Beacon may be made only by the President and must be promptly disclosed, along with the reasons for the waiver.

Glossary

“Employee” means any and all employees of Beacon

“Officer” means any officer or director of Beacon