

# Responsibility Disclosure Policy

Miller Moore

Effective Date: 08/23/2023

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## 1. Introduction

Miller Moore is committed to maintaining the highest standards of integrity, transparency, and accountability in all our operations. This Responsibility Disclosure Policy outlines our approach to managing risks, ensuring compliance with legal and regulatory requirements, and fostering a culture of ethical conduct across all levels of our organization.

## 2. Purpose

The purpose of this policy is to:

- Define the responsibilities of Miller Moore, its employees, and associated parties in upholding ethical standards.
- Establish clear guidelines for reporting and addressing potential issues related to compliance, ethical conduct, and risk management.
- Ensure that Miller Moore operates in a manner that is transparent, responsible, and aligned with our core values.

## 3. Scope

This policy applies to all employees, officers, directors, contractors, consultants, and any other parties acting on behalf of Miller Moore. It covers all aspects of our business operations, including trading, investment advisory services, and client interactions.

## 4. Responsibilities

### A. Miller Moore

- **Compliance with Laws and Regulations:** Miller Moore is committed to adhering to all applicable laws, regulations, and industry standards. We take responsibility for ensuring that our operations comply with relevant legal and regulatory requirements.
- **Ethical Conduct:** We expect all employees and associated parties to act with integrity, honesty, and transparency in all business dealings. Miller Moore promotes a culture of ethical conduct and holds individuals accountable for their actions.
- **Risk Management:** Miller Moore is responsible for identifying, assessing, and managing risks associated with our business activities. We implement robust risk management frameworks to mitigate potential risks and protect the interests of our clients and stakeholders.

## B. Employees and Associated Parties

- **Adherence to Policies:** Employees and associated parties are responsible for familiarizing themselves with and adhering to all Miller Moore policies, including this Responsibility Disclosure Policy.
- **Reporting Obligations:** Individuals are required to report any suspected violations of laws, regulations, or ethical standards promptly. Miller Moore provides a safe and confidential mechanism for reporting concerns without fear of retaliation.
- **Continuous Improvement:** Employees are encouraged to engage in continuous learning and development to enhance their understanding of compliance, ethical conduct, and risk management practices.

## 5. Reporting and Addressing Issues

- **Reporting Mechanism:** Miller Moore has established a clear and confidential reporting mechanism for employees and associated parties to report concerns. Reports can be made directly to the compliance department or through designated channels.
- **Investigation Process:** All reports of suspected violations will be promptly investigated by the compliance team. Miller Moore is committed to ensuring that investigations are conducted impartially and that appropriate actions are taken based on the findings.
- **No Retaliation:** Miller Moore strictly prohibits any form of retaliation against individuals who report concerns in good faith. We are committed to protecting whistleblowers and ensuring a safe environment for reporting.

## 6. Accountability and Enforcement

- **Consequences of Non-Compliance:** Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or business relationships. Miller Moore reserves the right to take legal action against individuals or entities that engage in unethical or illegal activities.
- **Continuous Monitoring:** Miller Moore regularly reviews and updates its policies and procedures to ensure they remain effective and aligned with evolving legal and regulatory requirements.

## 7. Policy Review and Updates

This Responsibility Disclosure Policy is subject to regular review and updates to ensure its continued relevance and effectiveness. Miller Moore will communicate any significant changes to this policy to all employees and associated parties.

## 8. Contact Information

For questions or concerns regarding this Responsibility Disclosure Policy, please contact:

- **Compliance Department**
- **Email:** [support@millermoore.com](mailto:support@millermoore.com)