

## Firm Brochure ADV Part 2A

### Item 1. Cover Page

**Zurich**  
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This Brochure ("Form ADV Part 2A") provides information about the qualifications and business practices of Parkview Ltd. ("Parkview"). Parkview is registered as an investment adviser ("RIA") with the United States Securities and Exchange Commission (the "SEC") under the Investment Advisers Act of 1940, as amended (the "Advisers Act"). If you have any questions about the contents of this brochure, please contact us by telephone at +41 44 283 40 80 or by e-mail at [info@parkview.ch](mailto:info@parkview.ch).

The information in this brochure has not been approved or verified by the SEC or by any state securities authority. Additional information about Parkview is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). There is no specific level of skill or training required to become a registered investment adviser with the SEC. This Brochure provides information for U.S. clients of Parkview; most provisions of the Advisers Act and of this Brochure do not apply to Parkview's non-U.S. clients.

### Item 2. Material Changes

No material changes have been made to this brochure since its last annual update in March 2021.

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#### Item 4. Advisory Business

##### Firm Description and Principal Owners

Parkview Ltd. ("Parkview" or "we"), a Swiss corporation based in Zurich, Switzerland, provides investment advisory services to clients with connections to the United States ("U.S."). Parkview was formed in Zurich on February 23, 2011.

Parkview is run by a team of shareholding partners:

- Marius André Holzer, Chief Compliance Officer and Chief Operations Officer for both companies; Parkview Ltd, Switzerland and Parkview US LLC, US
- Thomas J. Egger  
CEO Parkview Ltd, Switzerland
- Marcus R. Epprecht  
CEO Parkview US LLC, US
- Oussama Himani  
CEO Parkview Advisors LLC, UK
- Martin Liechti  
Shareholder Parkview Ltd, Switzerland

##### Services

Parkview helps entrepreneurs and their families sustain wealth across generations by delivering investment advisory, management, and controlling services. The services provided include the provision of discretionary portfolio management and continuous advice concerning investment of assets consistent with the circumstances, preferences and objectives of each client. As part of the information gathering process, Parkview determines the client's individual objectives, time horizon, risk tolerance, and liquidity needs and develops a tailored investment policy. Parkview discusses a client's prior investment history, as well as family composition and background.

Parkview's advice is limited to the types of securities and transactions as set forth in Section 8.

Parkview does not render any Legal or Tax advice.

##### Discretionary Asset Management Services

Under a discretionary management mandate, Parkview has the authority to supervise and direct the investments of and for each client's account generally in line with the investment profile agreed with the client and without prior consultation with the client. Parkview determines which securities are bought and sold for the account and the total amount of the purchases and sales. Parkview's authority may be sub-

ject to special conditions imposed by individual clients. For example, a client may restrict or prohibit transactions in certain types of securities.

##### Non-Discretionary (i.e., Advisory) Asset Management Services

Under a non-discretionary management mandate, Parkview makes investment recommendations to a client, and the client subsequently makes all investment decisions about the investments held in his or her account. In order to implement a client's decisions, the client may authorize Parkview to place orders for the execution of securities transactions for the client's account. Parkview generally provides advice concerning appropriate asset allocations, evaluation of investment managers, identification of risks, and specific investment recommendations.

If explicitly required by a non-discretionary client, Parkview may implement investment ideas which do not pertain to Parkview's investment universe. Parkview will disclose to the client if an investment idea is not part of Parkview's investment universe.

##### Consulting Services

Upon request, Parkview advises families on matters relating to family governance, succession planning, philanthropy as well as on matters related to their businesses (strategic advisory, M&A advisory).

##### Wrap Fee Programs

Parkview does not participate in wrap fee programs.

##### Assets under Management

As of December 31, 2021, Parkview managed approximately 201.4 million. \$139.2 million on a discretionary basis and 62.2 million on a non-discretionary basis.

## Item 5. Fees and Compensation

For its discretionary asset management service and nondiscretionary asset management service, Parkview charges a fee for its services based on a percentage of the market value of assets under management. The fixed asset management fee for discretionary and nondiscretionary asset management services is charged quarterly in arrears and is calculated on the basis of the average between the Net Asset Value (NAV) of all assets managed as of the beginning of any calendar quarter and the NAV as of the end of that quarter. The annual fees range from 0.5% to 1%, depending on the size and complexity of the mandate.

For certain Family Office Service Packages, Parkview offers flat fee arrangements based on scope and complexity of the mandate.

Parkview may waive, discount and/or negotiate fees at its discretion. Parkview may also charge additional fees for services outside the scope of the services described above. Any additional fees are disclosed to the client.

Parkview also advises clients on foreign currencies and the below fee schedule applies and is negotiable to such advice.

Compensation is not payable in advance. Parkview does not manage or advise accounts based on commissions, subscriptions fees, or hourly rate charges.

Parkview relies on custodian banks of its clients to value the assets in the respective client accounts, and Parkview computes its investment advisory fees based on these valuations provided by the custodian. At the end of the quarter Parkview arranges with the custodian for the direct payment of its fee from the respective client accounts. The client's statement from the custodian will reflect all amounts disbursed from the account, including the amount of any advisory fee paid to Parkview.

Consulting Services fees are determined based on the nature of the service provided and the complexity of each client's circumstances.

All fees are agreed prior to entering into a contract. The fees for consulting services (which are separate than fees charged for investment advice) are calculated and charged on a fixed fee basis, typically ranging from \$30,000 to \$300,000 per year, depending on size and complexity, and subject to the specific arrangement reached with the client. Consulting service fees are not charged in advance.

### Other fees you may incur

Fees charged by Parkview do not include custodian fees, fees for trade settlement, brokerage commissions, taxes or any other fee or taxes imposed by the custodian bank or the broker or National Authorities. The fees also do not include management or other fees charged by funds or other products that client accounts may be invested in from time to time. It is Parkview's philosophy to generally invest in the least expensive available share class.

## Item 6. Performance Based Fees and Side-by-Side Management

### Performance Based Fee Scheme

Parkview presently does not charge performance-based fees. However, Parkview may enter into performance-based fee arrangements with qualified clients in the future subject to individualized agreements with each client. To the extent Parkview enters into a performance or incentive fee arrangement, it will do so in accordance with Section 205(a)(1) and Rule 205-3 under the Advisers Act. Only clients who meet the following requirements may opt for the performance based fee scheme: (i) clients with at least \$ 1,000,000 under management with Parkview; (ii) clients with more than \$ 2,000,000 of net worth, excluding the value of the primary residence and certain debt secured by the property; or (iii) clients who are qualified purchasers under Section 2(a)(51) of the Investment Advisors Act of 1940, as amended (which generally is defined to include only individuals, companies or trusts with more than \$ 5,000,000 in investments). Parkview potentially can receive higher fees with a performance-based compensation structure than from those accounts that pay the asset-based fee schedule described above. To minimize this conflict, Parkview generally will enter into a performance fee arrangement upon the request of a client or in the case of specific investment performance objectives.

### Side-by-Side Management

Conflicts related to side-by-side management of different accounts may exist. For example, Parkview may manage more than one account according to the same or a substantially similar investment strategy. Side-by-side management of different types of accounts may raise conflicts of interest when two or more accounts invest in the same securities or pursue a similar strategy. These potential conflicts include the favorable or preferential treatment of an account or a group of accounts, conflicts related to the allocation of investment opportunities, particularly with respect to securities that have limited availability, such as initial public offerings, and transactions in one account that closely follow related transactions in a dif-

ferent account. In addition, the results of the investment activities for one account may differ significantly from the results achieved for other accounts, particularly as a result of Parkview's practice to individually tailor each client's investment portfolio. Parkview has policies and procedures in place aiming to ensure that all client accounts are treated fairly and equitably. Parkview strives to equitably allocate investment opportunities among relevant accounts over time. In addition, investment decisions for each account are made with specific reference to the individual needs and objectives of the account. Accordingly, Parkview may give advice or exercise investment responsibility or take other actions for some clients (including related persons) that may differ from the advice given, or the timing and nature of actions taken, for other clients. Investment results for different accounts, including accounts that are generally managed in a similar style, also may differ as a result of these considerations. Some clients may not participate at all in some investments in which other clients participate or may participate to a different degree or at a different time.

#### **Item 7. Types of Clients**

Parkview offers investment management services to international high net worth individuals and families as well as institutional investors (e.g. charitable endowments and financial institutions). These investors may use trusts or other entities to control their liquid assets. Such entities in some occasions can become the contracted client of the firm.

Parkview also provides services to individual's investments held within personal retirement accounts (IRA's).

Generally, Parkview works with clients with a minimum of \$10 million of assets under management. Parkview may accept accounts below the minimum requirements or may retain accounts that have dropped below the minimum requirement due to market fluctuation or investment performance. Accounts that have family, corporate or other relationships may be aggregated for purposes of the minimum account size.

#### **Item 8. Methods of Analysis, Investment Strategies and Risk of Loss**

##### Methods of Analysis

Parkview offers primarily institutional asset management. Rather than selecting individual securities, Parkview attempts to optimize a client's asset allocation following a previously defined investment policy

and then selects the best managers in each asset class based on research (manager due diligence and monitoring) provided by third parties. Macro-economic trends, cyclical and trending analysis of currencies, sectors, markets, industries, along with asset class return expectations and risk profiles drive the strategic and tactical asset allocation process.

In selecting specific securities, Parkview employs a bottom-up approach evaluating the fundamentals of the specific investment, comparisons to benchmarks and to similar securities, and timing.

Parkview offers investment management and advisory services typically on the following types of securities and transactions: exchange-listed securities, securities traded over-the-counter, foreign issuers, options (including covered and uncovered positions), corporate debt securities (and other commercial paper), certificates of deposit, investment company securities such as mutual funds, exchange traded funds, foreign exchange transactions, and futures contracts on intangibles.

Parkview will also invest in hedge funds or other private funds on a limited basis. Investments in private funds are available to "accredited investors" or "qualified purchasers," and they typically require investors to lockup their assets for a period of time. These investments may have limited, or no liquidity and they may involve different risks than investing in registered funds and other publicly offered and traded securities. Parkview relies on the valuation and performance data provided directly from the private funds. Private funds may often be delayed in providing Parkview with the valuation information; therefore, Parkview may likewise be delayed in reporting this information to the client. Parkview will rely on the accuracy of a client's representations in making corresponding representations regarding the investment restrictions on behalf of the client's account in connection with certain derivative and other transactions. Parkview also requires notification by the client if the client's representations become inaccurate.

In certain cases, Parkview may provide asset allocation recommendations that may include real estate holdings. These holdings are acquired through real estate investment trusts (REITs) and other investment vehicles. Parkview does not invest in real properties.

##### Material Investment Risks

Clients should bear in mind that investing in securities involves a risk of loss. Among other risks, investments will be subject to market risk, liquidity risk, credit and counterparty risk, interest rate risk, risk in fluctuations of commodity pricing, risk of loss due to political and economic developments in foreign markets, and

risks involving movements in the currency markets. Clients should be prepared to bear the risk of losing their investment in securities.

Past performance is not an indication as to future results.

Depending on the specific investments held within his or her Account, a Client may face the following investment risks:

**Market Risk:** Market risk refers to the risk of loss arising from general economic and market conditions, such as interest rates, availability of credit, inflation rates, commodity prices, economic uncertainty, changes in laws and national and international political circumstances. Each Account is subject to market risk, which will affect volatility of securities prices and liquidity. Such volatility or illiquidity could impair profitability or result in losses.

**Risk Related to Equity Investments:** Investments in equity securities generally involve a high degree of risk. Prices are volatile and market movements are difficult to predict. These price movements may result from factors affecting individual companies or industries. Price changes may be temporary or last for extended periods. The value of specific equity investments obviously correlates to the fundamentals of each particular security. Prices of equity investments may fall or fail to appreciate regardless of movements in securities markets.

**Risks Related to Fixed Income Investments:** Investments in fixed income securities (i.e., bonds) represent numerous risks such as credit, interest rate, reinvestment, liquidity, and prepayment risk, all of which affect the value of the security and volatility of such value. In general, securities with longer maturities are more sensitive to price changes. Additionally, the prices of high yield, fixed-income securities fluctuate more than high quality debt issues. Prices are especially sensitive to developments affecting the company's business and to changes in the ratings assigned by rating agencies. Prices are often closely linked with the company's stock prices. High yield securities can experience sudden and sharp price swings due to changes in economic conditions, stock market activity, and large sales by major investors, default, or other factors. Developments in the credit market may have a substantial impact on the companies we may invest in and will affect the success of such investments. In the event of a default, the investment may suffer a partial or total loss.

**Risks Related to Investments in Funds:** For purposes of this discussion, the term "Fund" includes, but is not limited to, a U.S. or non-U.S. unit investment trust, an open-end or closed-end mutual fund, a hedge fund, a

private equity fund, a venture capital fund, a real estate investment trust, an exchange traded fund ("ETFs") or any other private alternative or investment fund). Investments in Funds carry risks associated with the particular fund. Each fund and the respective manager will charge their own management and other fees, which will result in a Client bearing an additional level of fees and expenses. U.S. mutual funds generally must distribute all gains to investors, including investors who may not have an economic gain from investing in the fund, which can lead to negative tax effects on investors, particularly non-U.S. persons. Investments in certain non-U.S. funds by U.S. persons result in U.S. tax and reporting obligations and failing to comply with such requirements can result in significant penalties. Funds generally have unique risks of loss as described in their offering documents.

#### Risks Related to Investments in Derivatives:

**Leverage:** Certain investment instruments such as derivatives may use leverage to achieve returns. The use of leverage may have the effect of disproportionately increasing an account's exposure to the market for the securities or other assets underlying the derivative position and the sensitivity of an account's portfolio to changes in market prices for those assets. Leverage will tend to magnify both the positive impact of successful investment decisions and the negative impact of unsuccessful investment decisions by Parkview on an account's performance.

**Counterparty Credit Risk:** When derivatives or certain other instruments are purchased; a client's account will be subject to the ability and willingness of the other party to the contract (a "Counterparty") to perform its obligations under the contract. Although exchange-traded futures and options contracts are generally backed by a guarantee from a clearing corporation, an account could lose the benefit of a contract in the unlikely event that the clearing corporation becomes insolvent. A Counterparty's obligations under a forward contract, over-the-counter option, swap or other over-the-counter derivative contract are not so guaranteed. If the Counterparty to an over-the-counter contract fails to perform its obligations, an account may lose the benefit of the contract and may have difficulty reclaiming any collateral that an account may have deposited with the counterparty.

**Lack of Correlation:** The market value of a derivative position may correlate imperfectly with the market price of the asset underlying the derivative position. To the extent that a derivative position is being used to hedge against changes in the value of assets in an account, a lack of price correlation between the derivative position and the hedged asset may result in an incomplete hedge.

**Illiquidity:** Over-the-counter derivative contracts are usually subject to restrictions on transfer, and there is generally no liquid market for these contracts. Although it is often possible to negotiate the termination of an over-the-counter contract or enter into an off-setting contract, a Counterparty may be unable or unwilling to terminate a contract with an account, especially during times of market instability or disruption. The markets for many exchange traded futures, options and other instruments are quite liquid during normal market conditions, but this liquidity may disappear during times of market instability or disruption.

**Less Accurate Valuation:** The absence of a liquid market for over-the-counter derivatives increases the likelihood that Parkview will not be able to correctly value these interests.

**Currency Exposure:** Parkview invests in securities and other investments that are denominated in currencies other than U.S. Dollars. Accordingly, the value of such assets may be affected favorably or unfavorably by fluctuations in currency rates. Parkview seeks to hedge the foreign currency exposure, but such hedging strategies may not necessarily be available or effective and may not always be employed. Accounts managed by Parkview are routinely subject to foreign exchange risks and bear a potential risk of loss arising from fluctuations in value between the U.S. Dollar and such other currencies.

**Non-U.S. Investments:** Investments in non-U.S. securities expose the client's portfolio to risks that in addition to those risks associated with investments in U.S. securities. Such risks include, among other things, trade balances and imbalances, economic policies of various foreign governments, exchange control regulations, withholding taxes, potential for nationalization of assets or industries, and the political instability of foreign nations.

#### **Item 9. Disciplinary Information**

Parkview has not been involved in any legal or disciplinary events.

#### **Item 10. Other Financial Industry Activities and Affiliations**

As described in Item IV, for certain clients, Parkview works closely with its subsidiary in the United States, Parkview US LLC, to provide investment advisory services. Parkview US LLC is a registered investment adviser with the SEC and wholly owned by Parkview.

Parkview is affiliated with Parkview Advisors LLP, a London based Investment Advisor, authorized and regulated by the British Financial Conduct Authority (FCA).

Parkview and its management personnel neither are registered nor have an application pending to register as, broker-dealers, registered representatives of a broker-dealer, future commissions merchants, commodity pool operators, commodity trading advisors, or associated persons of the foregoing entities.

Parkview is a member of VQF (member number 13043). The VQF Financial Services Standards Association is organized under private law as an Association under the terms of Art. 60 et seq. of the Swiss Civil Code (SCC) (established 1998), recorded in the Commercial Register of the Canton of Zug and is the oldest and largest self-regulatory organization (SRO) pursuant to Art. 24 of the Anti-Money Laundering Act (AMLA) with the official recognition of the Federal Financial Market Supervisory Authority (FINMA). In addition, the VQF also has rules of professional conduct for asset managers which are officially recognized by FINMA and in this regard is active as an Industry Organization for independent Asset Managers (BOVV). In this way, Parkview is subject to the regulations of the Swiss financial regulator, FINMA.

Parkview is moreover a member of FINOS – Finanzombudsstelle Schweiz. FINOS is an ombudsman service located in Zurich, Switzerland, and provides dispute resolution services to affiliated financial service providers and their clients. FINOS is legally recognized pursuant to Art. 84 para. 1 FinSA.

#### **Item 11. Code of Ethics, Participation in Client Transactions and Personal Trading**

##### Code of Ethics

Parkview has adopted a Code of Ethics (the "Code") and attendant policies and procedures governing personal securities transactions by Parkview and its personnel. The Code also provides guidance and instruction to Parkview and its personnel on their ethical obligations in fulfilling its duties of loyalty, fairness and good faith towards the clients. The overriding principle of Parkview's Code of Ethics is that all employees of Parkview owe a fiduciary duty to clients for whom Parkview acts as investment adviser or sub-adviser. Accordingly, employees of Parkview are responsible for conducting personal trading activities in a manner that does not interfere with a client's portfolio transactions or take improper advantage of a relationship with any client.

The Code contains provisions designed to try to: (i) prevent, among other things, improper trading by Parkview's employees; (ii) identify conflicts of interest; and (iii) provide a means to resolve any actual or potential conflicts of interest in favor of the clients. The Code attempts to accomplish these objectives by, among other things, (i) requiring preclearance of specific trades, which includes documenting any exceptions to such preclearance requirement; (ii) restricting trading in certain securities that may cause a conflict of interest, as well as (iii) periodic reporting regarding transactions and holdings of employees.

The Code contains sections including, but not limited to, the following key areas: (i) restrictions on personal investing activities; (ii) gifts and business entertainment; and (iii) outside business activities.

The Code also provides for the Parkview's execution of supervisory policies and procedures, and the review and enforcement processes of such policies and procedures. Parkview has designated a Chief Compliance Officer responsible for maintaining, reviewing and enforcing Parkview's Code of Ethics and corresponding policies and procedures.

The fundamental position of Parkview is that, in effecting personal securities transactions, personnel of Parkview must place at all times the interests of clients ahead of their own pecuniary interests. All personal securities transactions by these persons must be conducted in accordance with the Code of Ethics and in a manner to avoid any actual or potential conflict of interest or any abuse of any person's position of trust and responsibility. Further, these persons should not take inappropriate advantage of their positions with or on behalf of a client.

Parkview will provide a copy of the Code of Ethics to any client or prospective client upon request.

#### Participation or Interest in Client Transactions

Parkview employees or related persons invest regularly alongside the firm's clients, both to align the interest of firm and personnel and firm clients and as an expression of confidence in our portfolio management efforts. In order to ensure that Parkview personnel never trade ahead of their clients, the firm generally tries to ensure that all trading in specific positions for officer and employee accounts to come after the analogous trades are executed for client accounts.

#### **Item 12. Brokerage Practices**

Parkview does not have custody or possession of client assets; each of Parkview's clients maintains custody of its assets at one or more custodians (usually Swiss based banks). Each custodian bank acts as a broker-dealer itself and/or maintains relationships with designated broker-dealers (including potentially an affiliate of the custodian bank). Parkview effectuates security transactions through the custodian, or the broker or dealer designated by the custodian bank selected by the client. Parkview does not guarantee best execution or the best commissions because Parkview does not control these factors. Parkview operates exclusively on this directed brokerage basis whereby the client and/or the client's choice of custodian bank selects the broker-dealer to be used for securities transactions.

Therefore, clients should be aware of the following:

- Parkview does not negotiate commission rates with broker-dealers with whom orders are placed either directly or via the custodian bank because the broker-dealer is determined by the custodian bank and/or the client. The applicable commissions and fees charged for securities transactions are agreed upon between the client and the custodian bank when the client accepts the applicable commission schedule published by the custodian bank or otherwise agrees.
- Commission charges will vary among clients and best execution may not be guaranteed by Parkview.

Because the client selects the custodian and thereby the broker-dealer to be used for securities transactions involving its account, different clients may have accounts at the same custodian bank, or a single client may have multiple accounts at different custodian banks. Therefore, a client may pay an executing broker a higher commission for a securities transaction than might be charged by another broker-dealer executing the same transaction or than the commission charged by the broker-dealer executing a similar transaction for another client of Parkview. Commission charges may also vary between clients. It also is possible that the broker-dealer used for transactions may not be a registered broker-dealer under the U.S. Securities Exchange Act of 1934, as amended (the "Exchange Act").

#### Block Trades

Parkview US generally will combine orders into block trades when purchasing the same security for multiple client Accounts. Such aggregated orders ("block trades") will be pre-allocated among the participating

client Accounts. When selecting the participating accounts, a variety of factors such as suitability, investment objectives and strategy, risk tolerance and / or the ability to invest additional funds will be taken into consideration. In determining the portion for each participating account further factors such as account's size, diversification, asset allocation and position weightings as well as any other appropriate factors might be of relevance. Participating accounts in a block trade placed with the same broker or the same custodian bank generally will receive an average price and transaction costs will be shared on a proportionate basis and as determined in the agreement with the custodian. This can either be a sharing on a pro rata basis, or covered with a "ticket fee", or based on the implemented digression model, whereas costs decrease in relation to the purchased quantity and include the application of a minimum rate, when shared costs are below a defined amount. Partial fills of transactions will be allocated on a pro rata share basis.

Because Parkview's clients maintain accounts at different custodian banks and because these custodian banks mandate the use of a specific broker, often Parkview US places more than one block trade for the same security with more than one broker. Parkview US transmits such block trades to more than one broker in a random pattern (i.e., Parkview US does not favor one custodian bank or broker over another with respect to the order in which block trade orders are sent). The average price realized on a securities order placed with different brokers will vary from broker to broker, and clients generally will receive different average prices and transaction costs for the same security order depending upon the custodian bank and the respective broker used in the block trade. Also note, since most Swiss custodian banks warehouse securities orders until filled, there may be delays in settlement between client Accounts depending on the practice of the respective custodian bank and/or broker.

#### Decision Making Process; Balancing the Interests of Multiple Client Accounts

In making the decision as to which securities are to be purchased or sold and the amounts thereof, Parkview is guided by the general guidelines set up at the inception of the adviser-client relationship in cooperation with the client and a periodic review of the asset allocation. These general guidelines cover such matters as the relative proportion of debt and equity securities to be held in the portfolio, the degree of risk which the client wishes to assume and the types and amounts of securities to be held in the portfolio. Parkview's authority may be further limited by specific instructions from the client, which may restrict or prohibit transactions in certain securities.

Parkview may manage numerous accounts with similar or identical investment objectives or may manage accounts with different objectives that may trade in the same securities. Despite such similarities, portfolio decisions relating to client investments and the performance resulting from such decisions may differ from client to client. Parkview will not necessarily purchase or sell the same securities at the same time or in the same proportionate amounts for all eligible clients, particularly if different clients have selected different investment profiles, have materially different amounts of capital under management with Parkview or different amounts of investable cash available. In certain instances, such as purchases of less liquid publicly traded securities (as some small cap securities frequently are) or oversubscribed public offerings, it may not be possible or feasible to allocate a transaction pro rata to all eligible clients, especially if clients have materially different sized portfolios. Therefore, not all clients will necessarily participate in the same investment opportunities or participate on the same basis.

#### Use of Soft Dollars

Parkview may maintain soft dollar arrangements, and to the extent it does it will only do so in accordance with the conditions of the safe harbor provided by Section 28(e) of the Exchange Act. Section 28(e) is a "safe harbor" that permits an investment manager to use brokerage commissions or "soft dollars" to obtain research and brokerage services that provide lawful and appropriate assistance in the investment decision-making process.

Research services within Section 28(e) may include, but are not limited to, research reports (including market research); certain financial newsletters and trade journals; software providing analysis of securities portfolios; corporate governance research and rating services; attendance at certain seminars and conferences; discussions with research analysts; meetings with corporate executives; consultants' advice on portfolio strategy; data services (including services providing market data, company financial data, certain valuation and pricing data and economic data); and advice from brokers on order execution.

Brokerage services within Section 28(e) may include, but are not limited to, services related to the execution, clearing and settlement of securities transactions and functions incidental thereto (i.e., connectivity services between an investment adviser and a broker-dealer and other relevant parties such as custodians); trading software operated by a broker-dealer to route orders; software that provides trade analytics and trading strategies; software used to transmit orders; clearance and settlement in connection with a

trade; electronic communication of allocation instructions; routing settlement instructions; post trade matching of trade information; and services required by the SEC or a self-regulatory organization such as comparison services, electronic confirms or trade affirmations.

#### Trade Errors

Although Parkview's goal is to execute trades seamlessly in the manner intended by the client and consistent with its investment decisions, Parkview recognizes that errors can occur for a variety of reasons. Parkview's policy in dealing with such errors is to:

- Identify any errors in a timely manner.
- Correct all errors so that any affected account is placed in the same position it would have been in had the error not occurred.
- Incur all costs associated with correcting an error (or to pass the costs on to the broker, depending on which party is at fault). Costs from corrective actions are not to be passed on to a client.
- Evaluate how the error occurred and assess if any changes in any processes are warranted or if any continuing education is required.

The consequences and the required corrective measures may be different depending upon the nature of the error or the account affected.

#### **Item 13. Review of Accounts**

All client accounts are reviewed at least quarterly in an effort to ensure that they remain aligned with the client's investment policy and are positioned appropriately given current market conditions as part of Parkview's general investment process.

#### **Item 14. Client Referrals and Other Compensation**

Parkview may pay fees for client referrals. Such arrangements comply with the conditions and requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940.

Parkview may receive remuneration from third parties in connection with its investment advisory services. Such remuneration can include referral fees, marketing fees, discounts, finder's fees, service fees, including shareholder service fees, 12b-1 fees or bonus commissions paid by mutual funds, privately offered funds, insurance products, variable annuities or

other investment products paid to Parkview for recommending an investment, for investing client funds in such product or for marketing assistance or the performance of certain administrative tasks associated with making an investment. Such remuneration received by Parkview from third parties belongs to the client and if retained by Parkview will reduce the fee payable by the client to Parkview.

Parkview's employees or associated persons may be invited to attend seminars and meetings with the costs associated with such meetings borne by a sponsoring brokerage firm or other party extending the invitation.

#### **Item 15. Custody**

Parkview typically is given authority to have its fees directly deducted from a client's account. Consequently, Parkview is deemed to have custody of such funds. Parkview has established procedures to ensure the client's account is held at a qualified custodian in a separate account for each client. The client establishes the bank account directly and therefore is aware of the qualified custodian's name, address and the manner in which investments are maintained. Account statements are prepared by the custodian bank and delivered directly to the client or the client's representative at least quarterly. Generally, these statements include a listing of all valuations and all transactions occurring during the period. Clients should carefully review these statements and when they have questions contact either Parkview or the custodian bank. The custodian bank also provides the client with all required year-end tax information.

Parkview also may provide performance information to advisory clients about the client's performance, which may also include a reference to a relevant market index or benchmark. Parkview may provide reports analyzing the sources of each account's performance, including customary performance attribution and risk measurement statistics such as standard deviations, Sharpe ratios, deviations from benchmark returns, and investments that had the largest positive and negative impacts on performance.

#### **Item 16. Investment Discretion**

Parkview accepts discretionary authority to manage client accounts as described above.

Clients rarely restrict the authority by which Parkview may act; however, each client has the opportunity to communicate any form of limitation in writing. In the context of a discretionary mandate, Parkview makes investment decisions without consulting the client by

utilizing its limited power of attorney for the management of the account maintained at the custodian bank selected by the client. In the context of a non-discretionary mandate, Parkview's investment discretion is limited to an advisory role and Parkview does not implement investment decisions without the approval of the client. Parkview never has discretionary authority to select a qualified custodian for a client's account.

#### **Item 17. Voting Client Securities**

##### Proxy Voting

Parkview generally does not have the authority to vote client proxies. Clients make arrangements directly with their custodian to vote proxies for securities or where proxy or other solicitation materials have to be sent to. If Parkview inadvertently receives any proxy materials on behalf of a client, Parkview will promptly forward such materials to the client.

Parkview will exercise investment authority for certain corporate actions (such as, but not limited to, tenders, rights offerings, splits, etc.) in connection with discretionary accounts. For advisory clients, corporate actions are discussed with them prior to the event taking place.

Clients who have questions about proxies may contact Parkview for further information.

##### Class Actions

Parkview does not direct client participation in class action lawsuits.

Parkview will determine whether to return any documentation inadvertently received regarding clients' participation in class actions to the sender, or to forward such information to the appropriate clients.

Parkview will not advise or act on behalf of clients in any legal proceeding, including bankruptcies or securities shareholder class action litigation involving securities held or previously held in client accounts. Accordingly, Parkview is not responsible for responding to, or forwarding to clients, any class action settlement offers relating to securities currently or previously held in the client account.

#### **Item 18. Financial Information**

Parkview has not been the subject of a bankruptcy petition at any time. As of the date of this brochure we do not believe it is reasonably likely that any future liability will impact our ability to meet our contractual commitments to our clients.