



**Saturna Capital Corporation**

1300 N. State Street  
Bellingham, WA 98225  
800/SATURNA  
[www.saturna.com](http://www.saturna.com)

**September 28, 2020**

*This wrap fee program brochure provides information about the qualifications and business practices of Saturna Capital Corporation. If you have any questions about the contents of this brochure, please contact us at 1-800/SATURNA.*

*The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Saturna Capital Corporation also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

*Saturna Capital Corporation ("Saturna") is a registered investment adviser under the Investment Advisers Act of 1940, as amended. However, registration does not imply a certain level of skill or training.*

## Material Changes

### Material Changes

This September 28, 2020 annual amendment to Part 2A - Appendix 1, Wrap Fee Program Brochure of Form ADV contains the following material change since the firm's September 26, 2019 annual amendment:

Saturna has expanded its services to include financial planning for Muslim Investors.

### Noteworthy Non-Material Changes

This September 28, 2020 amendment contains enhancements and updates to various disclosures, including those reflected in the February 18, 2020 other-than-annual amendment.

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## Services, Fees, and Compensation

Throughout this brochure we refer to our Core Values, a set of guiding principles according to which Saturna is managed. Please visit [www.saturna.com](http://www.saturna.com) for more information.

Saturna advises a variety of accounts divided between (1) Investment Management Accounts (including Investment Management Accounts in connection with SMA Programs offered by third-party Sponsor firms) for individuals, families, trusts, estates, corporations, retirement plans, (2) Financial Planning (limited to Muslim Investors) for individuals, families, and trusts, and (3) Pooled Investment Funds (mutual funds and private funds). Each Investment Management Account and Pooled Investment Fund is assigned a primary account manager, responsible for the client's portfolio. Client reviews normally include assets, income, tax situation, family needs, estate planning, and risk preferences.

When advising individuals or families, we often advise on many aspects of the client's financial arrangements because the assets often include retirement plans, trusts, real estate, and business interests, all of which are involved in conducting an appropriate investment program.

As part of our Core Values, Saturna strives to deliver superior performance to our investors. We tailor our advisory service to the specific needs of each client by first conducting a thorough analysis of the client's financial situation, goals, and risk tolerance. The result of our analysis is a simple statement of investment objectives.

All Investment Management Account clients complete the Saturna Investment Management Agreement, which details the terms of our relationship.

As part of our Core Values, Saturna provides high-value services at low cost. The annual advisory fee for Investment Management Accounts is \$2,500 plus 0.5% of the first \$5 million and 0.4% on amounts over \$5 million, with a minimum quarterly fee of \$1,250 (minimum \$5,000 annually). Accounts with less than \$1 million are limited to holding only equities and mutual funds. We believe this fee structure is reasonable in light of the services provided and, as such, Saturna does not generally negotiate fees. Extra fees or other arrangements may be mutually agreed depending upon the complexity of the services rendered. The following table illustrates the effective rate for accounts of varying value.

<b>Account Value</b>	<b>Effective Annual Rate</b>
\$500,000	1.00%
\$1,000,000	0.75%
\$2,500,000	0.60%
\$10,000,000	0.475%

Clients have the option of purchasing investment products Saturna recommends through other brokers or agents not affiliated with Saturna. There are no brokerage commissions when securities are traded through

Saturna Brokerage Services ("SBS"). When clients select SBS as their broker, the single asset-based advisory fee includes investment management, trading, and custody ("wrap fee").

In addition to offering private Investment Management Accounts directly to its advisory clients, Saturna may be selected by a financial institution sponsor ("Sponsor") of a separately managed account program ("SMA Program") to serve as a discretionary investment adviser. An SMA Program Sponsor provides its SMA Program participants with a bundle of services for a single fee. Typically, these services include research of investment managers, such as Saturna, ongoing monitoring of performance, execution of client portfolio transactions, and custody of the participant's assets. Under a "dual-contract" SMA Program arrangement, the client enters into an agreement with the Sponsor firm and enters into an investment management agreement with Saturna. In a dual-contract SMA Program, the investment management fee may not be included in the Sponsor's bundled fee and, in those cases, the client pays the advisory fee directly to Saturna.

The annual advisory fee for SMA Program accounts is 0.50% of the first \$5 million and 0.40% on amounts over \$5 million. There is no minimum quarterly advisory fee for accounts managed by Saturna in connection with SMA Programs.

Fees are computed and deducted from accounts after the end of each quarter, based on the account's value at the end of the quarter. Fees are paid in arrears and deducted from client's assets. There is no fee for the initial (partial) quarter. Either party may cancel contracts at any time without penalty. Saturna may change fees only after 60 days written notice. The Advisory Agreement authorizes Saturna to deduct advisory fees directly from a client account. When the Agreement covers more than one related Account, assets are combined when calculating annual fee reductions.

When we act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. Almost all Saturna's revenue and thus potential profitability is driven by the amount of assets under management, the great majority of which comes from the mutual funds for which Saturna Capital is the investment adviser. Our Core Values require us to always do what is best for the client. To minimize potential conflicts of interest, Saturna excludes client assets invested in mutual funds that Saturna manages or for which Saturna or SBS receives a distribution fee or other payment, from the amount on which advisory fees are computed. This can substantially reduce the net fee an advisory client pays.

When Saturna elects to allocate a portion of a client's assets to a mutual fund, we select a class without a distribution or 12b-1 fee whenever possible.

A wrap fee program such as that offered by Saturna may cost clients more or less than purchasing such services separately, depending on factors such as broker selection, custody services, and trading volume in the client's account. Clients pay additional fees for services not covered under the Investment Management Agreement, such as outgoing wire transfers.

The fee for Financial Planning is \$500 and is waived for clients with investable cash and securities of \$125,000 or greater. Any follow-up review or update of a client's plan will be at the client's request and may involve a separate fee.

Saturna primarily relies on the business development and marketing activities of our personnel to solicit new business. However, we have entered into arrangements to pay third parties to solicit new business on behalf of our firm outside of the United States. Outside these arrangements, Saturna does not provide compensation for Investment Management Account referrals nor does it receive cash or other economic benefit from a non-client in connection with giving advice to clients. Investment Management Accounts may involve certain conflicts of interest, described throughout this brochure.

Fees for Pooled Investment Funds vary by contract and are negotiated. Please see the Performance Based Fees and Side by Side Management section for further information.

## **Account Requirement and Types of Clients**

Saturna advises a variety of accounts divided between (1) Investment Management Accounts (including Investment Management Accounts in connection with SMA Programs offered by third-party Sponsor firms) for individuals, families, trusts, estates, corporations, and retirement plans, (2) Financial Planning (limited to Muslim Investors) for individuals, families, and trusts, and (3) Pooled Investment Funds (mutual funds and private funds).

Investment Management Accounts are accepted and retained at the discretion of management. Saturna imposes a \$1,000,000 account minimum (other than accounts in SMA Programs offered by third-party Sponsor firms) that may be waived.

## **Portfolio Manager Selection and Evaluation**

Saturna's President assigns a primary portfolio manager to each managed account, who is responsible for continuous supervision of their accounts. In the absence of a portfolio manager, another manager supervises those accounts and can take any actions deemed appropriate. Portfolio Managers for Investment Management Accounts are typically selected from the pool of Saturna's portfolio managers. For example, a client seeking current income and preservation of capital would typically be matched with a bond portfolio manager. The removal or replacement of portfolio managers is at the client's discretion.

Although Saturna claims compliance with the Global Investment Performance Standards (GIPS®) and prepares and presents reports in compliance with GIPS standards, portfolio manager performance is not evaluated based on these standards. Saturna Capital Corporation has been independently verified by ACA Performance Services for the periods January 1, 2006, through December 31, 2018. The verification report is available upon request. Verification assesses whether (1) the firm has complied with all composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present

performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific presentation.

As a result of costs associated with trading securities, portfolio managers may have a conflict of interest to favor a lower turnover approach. Saturna has numerous policies and procedures designed to mitigate potential conflicts of interest. In practice, Saturna believes its compensation structure and the low cost of trading securities mitigates this risk.

For more information, see the Code of Ethics, Participation or Interest in Client Transactions and Personal Trading sections of this document.

## **Advisory Business**

Established in 1989, Saturna is an SEC-registered investment advisor. Nicholas Kaiser is the principal owner. Jane Carten, Mr. Kaiser's daughter and President and Chief Executive Officer of Saturna, has voting control. Saturna serves as investment adviser to two mutual fund trusts: Amana Mutual Funds Trust and Saturna Investment Trust. Amana Mutual Funds Trust is composed of four series: Amana Income Fund, Amana Growth Fund, Amana Developing World Fund, and Amana Participation Fund. Saturna Investment Trust is composed of nine series: Sextant International Fund, Sextant Growth Fund, Sextant Core Fund, Sextant Short Term Bond Fund, Sextant Bond Income Fund, Sextant Global High Income Fund, Idaho Tax Exempt Fund, Saturna Sustainable Equity Fund, and Saturna Sustainable Bond Fund. The disclosures in this Part 2A – Appendix1, Wrap Fee Program Brochure of Form ADV relate to Saturna's Investment Management Accounts. Although this brochure refers to the mutual funds managed by Saturna (the "Funds"), this document should not be considered an offering document for the Funds. Please see the Funds' Prospectus, Statement of Additional Information, and other reports to shareholders for disclosures relating to the Funds. These documents are available on Saturna's website, [www.saturna.com](http://www.saturna.com).

When advising individuals or families, we often advise on many aspects of the client's financial arrangements because the assets often include retirement plans, trusts, real estate, and business interests, all of which are involved in conducting an appropriate investment program.

We tailor our advisory service to the specific needs of each client by first conducting a thorough analysis of the client's financial situation, goals, and risk tolerance. The result of our analysis is a simple statement of investment objectives.

We serve a variety of special client needs, such as those of Muslim investors. Our first and largest client is the Amana Mutual Funds Trust, which follows Islamic principles that impose restrictions on the securities in which the Trust may invest. As long-term value investors, we favor equities of companies with low financial leverage and growth at a reasonable price. We further favor investments that pass our environmental, social and governance (ESG) screens. Specific investment guidelines are developed between portfolio managers and

clients as required by the client's stated needs. Clients may impose restrictions on investing in certain securities or types of securities.

The portfolio management services Saturna offers to Investment Management Accounts ("wrap fee accounts") are substantially similar to those offered to other accounts, such as Pooled Investment Funds. Saturna receives the entirety of the wrap fee for the services it provides to Investment Management Accounts with the exception of sub-advised accounts. For these accounts, Saturna may receive only a portion of the fee.

Saturna offers financial planning services to Muslim Investors. In addition to the delivery of a financial plan based upon a client's financial situation and objectives, these services include advice on asset allocation within a select group of mutual funds managed in accordance with Islamic principles. It is likely that this select group will consist solely of Amana funds for which Saturna, or an affiliate, receives compensation for management, administration, and distribution. A client is under no obligation to implement the recommended allocation and is free to invest in securities not offered by, or affiliated with, Saturna. Please note that advice on asset allocation is not currently offered with regard to securities held in employer-sponsored retirement plans. For non-Investment Management Account clients, financial planning and related asset allocation services end with the delivery of the plan and, as such, do not include ongoing monitoring.

As of 06/30/2020, Saturna managed \$4,067,899,000 of client assets on a discretionary basis. Saturna does not provide investment management services to any accounts on a non-discretionary basis.

## **Performance Based Fees and Side-By-Side Management**

Saturna manages a variety of pooled investment funds, including privately managed portfolios and thirteen affiliated mutual funds. In connection with the management of some of these accounts, Saturna receives a performance-based fee; that is, a fee based on a share of capital gains or capital appreciation of account assets. Portfolio managers are eligible for performance-based compensation. As such, Saturna and its portfolio managers may have incentive to favor accounts for which they receive a performance-based fee over accounts (perhaps with similar objectives) without performance-based fees. A similar conflict may exist from managing accounts in a similar investment style, but some of which pay a higher advisory fee. Other conflicts may arise from managing accounts owned by Saturna, its owners or its employees.

Saturna has designed policies and procedures to mitigate these potential conflicts of interest and which are reasonably designed to monitor and prevent Saturna from inappropriately favoring one account over another. Saturna's policies do not allow portfolio managers to advise separate clients to both purchase and sell the same security on the same day. Saturna has adopted "bunch" order policies to further ensure that one client is not advantaged over another. When Saturna believes it can do so and achieve best execution, orders placed at the same time with the same instructions for Saturna clients will be executed as a "bunched" order with each account receiving the same average execution price. In the event of a partially filled "bunched" order, shares are

allocated pro-rata over the accounts participating in the original order. When circumstances dictate, or when Saturna believes that using multiple execution firms will minimize market impact, part or none of the order may be “bunched.” As a result, clients could receive differing execution prices.

## **Methods of Analysis, Investment Strategies, and Risk of Loss**

We are primarily long-term investors, seeking to preserve and grow clients’ capital over time. We believe that for the long-term investor equity securities are the investment of choice, but we recognize that fixed income or cash equivalents may be better suited in certain circumstances. Therefore, we also offer advice on most securities commonly held in U.S. investment accounts: domestic and foreign common and preferred stocks; government, corporate, and municipal bonds; mutual funds; convertible securities; warrants; exchange-traded option contracts; and partnership interests.

We believe in long-term investing; not short-term speculation. The annual portfolio turnover in the portfolios we manage rarely exceeds 20% (often less) and we favor holding securities that we have selected over one or more full market cycles. While we do selectively add positions to client portfolios, we normally do not engage in short-term trading, short sales, or margin transactions.

In selecting investments, we are value-oriented; we are reluctant to pay a premium for a stock and endeavor to buy stocks that we believe to be reasonably valued. One of our Core Values is to make investments only when the expected returns outweigh the risks: we don’t chase fad stocks or fashionable investment trends. We seek companies that represent high quality operations, with large free cash flows, sustainable growth rates, increasing dividends, and low price volatility. We favor companies in which management has a considerable stake. Once a position is held, we monitor market conditions, industry developments, and other factors that may affect the rationale for holding the investment. Although we consider valuation when monitoring a client’s investments, we may not necessarily liquidate a position solely because of a relatively high valuation.

We advocate ethical investing, believing that companies with effective corporate responsibility policies are better positioned to avoid crises that could lead to reputation damage, higher costs, lost production, and fraudulent operations. We favor companies with stable earnings and strong balance sheets free of excessive debt. Because we are moderately risk-averse, our performance may trail the averages in rising markets, as we seek to minimize losses during falling markets.

We look for investment opportunities globally. Analytical responsibility is divided among our investment staff by sectors, industries and countries. Portfolio managers select equity issues from our recommended list.

When a client’s objective is income, we generally use higher-quality short to medium term bonds, either taxable or tax-exempt, and high-yield equities, but we may elect to allocate a portion of the client’s account to one or more Funds that invest in taxable or tax-exempt fixed-income securities, including *Sukuk*.



Saturna gathers investment information from many sources. We maintain our own research files on hundreds of actively followed companies. We maintain our own database for stock screening and evaluations. Our analysts regularly read numerous financial and market publications, and also review securities and markets with independent analytical services. Our analysts travel domestically and internationally to investigate economic conditions, participate in investment conferences and meet with company managements.

Investing involves risk, including the risk of loss. An Investment Management client of Saturna must be prepared to accept this risk and only consider investing in a strategy if they are willing to accept the risk that they may lose money. Principal value, yields, and total returns will change with the fluctuations in the securities markets as well as the fortunes of the industries and companies in which a strategy invests.

As noted above, our asset allocation recommendations in connection with Financial Planning are likely to be limited to the Amana funds. Although we will recommend prudent and diversified investment strategies, please remember that all investments, including mutual funds, involve risk, including loss of principal. There is no guarantee that any recommended strategy or allocation will meet a client's investment objectives, provide a given level of income, or protect against loss. Please consult a fund's prospectus for more information about fund-specific risks. As always, you should carefully consider all of your options before relying on any advice you receive, including from us.

### **Investment Management Account Strategy**

The Investment Management Account Strategy invests primarily in a diversified portfolio of equity issues. The strategy diversifies its investments across industries and companies, and generally follows a value investment style. Portfolios are tailored to an individual client's needs. On a case-by-case basis, Saturna may invest a client's assets in one or more of the Funds where Saturna believes such an investment is an efficient and cost effective means to gain market exposure to the types of securities in which the Fund invests.

### **Islamic Investment Management Account Strategy**

Clients may elect The Islamic Investment Account Strategy, which is substantially similar to the Investment Management Account Strategy with the exception that investments are limited to holdings consistent with Islamic finance principles. On a case-by-case basis, Saturna may invest a client's assets in one or more of the Amana Funds where Saturna believes such an investment is an efficient and cost effective means to gain market exposure to the types of securities in which the Fund invests.

### **Global Sustainable Equity Investment Management Account Strategy**

Clients may elect The Global Sustainable Equity Investment Account Strategy. The Strategy invests primarily in a diversified portfolio of equity issues focused on large and mid-cap value investments. Portfolios are tailored to an individual client's needs. Saturna considers issuers with sustainable characteristics to be those issuers that are more established, consistently profitable, and financially strong, and with robust policies in the areas of the

environment, social responsibility, and corporate governance ("ESG"). Saturna employs a sustainable rating system based on its own, as well as third-party, data to identify issuers believed to present low risks in ESG. Saturna also uses negative screening to exclude security issuers primarily engaged in higher ESG risk businesses such as alcohol, tobacco, pornography, weapons, gambling, and fossil fuel extraction. Under normal circumstances portfolios are limited to holding no more than 40% in issues from a single country and no more than 30% in issues from developing countries.

## **Principal Investment Risks**

The securities in which clients invest may experience significant volatility in response to economic or market conditions or adverse events that affect a particular industry, sector, or company. Our strategy tends to favor larger companies and, to a lesser extent, midsize companies. Larger companies may have slower rates of growth as compared to smaller, faster-growing companies. Midsize companies may have more limited financial resources, products, or services, and tend to be more sensitive to changing economic or market conditions.

Clients may invest in securities that are not traded in the United States when market conditions or investment opportunities arise that, in our judgment, warrant such investment. Investments in the securities of foreign issuers may involve risks in addition to those normally associated with investments in the securities of US issuers, including: (1) foreign political and economic instability; (2) adverse movements in foreign exchange rates; (3) currency devaluation; (4) the imposition or tightening of exchange controls or other limitations on repatriation of foreign capital; (5) changes in foreign governmental attitudes towards private investment, including potential nationalization, increased taxation, or confiscation of assets; and (6) differing reporting, accounting, and auditing standards of foreign countries. The risks of foreign investing are generally magnified in the smaller and more volatile securities markets of the developing world.

The Islamic Investment Management Account Strategy limits the securities purchased to those consistent with Islamic finance principles. This generally restricts the ability to invest in certain market sectors, such as financial companies and conventional fixed-income securities, which limits investment opportunities and may affect performance. Because Islamic principles preclude the use of interest-paying instruments, cash reserves do not earn interest income.

The Global Sustainable Equity Investment Account Strategy limits the securities purchased to issuers that Saturna considers to be more established, consistently profitable, and financially strong, and with robust policies in the areas of the ESG. This limitation works to limit investment opportunities and may affect performance.

To the extent Saturna invests an individual Investment Management Account's assets in shares of a Fund, such investments will be exposed to the Fund's investment strategies and risks, which is disclosed in the Fund's prospectus and statement of additional information.

## **Voting Client Securities**

Saturna does not accept authority to vote client securities in individual Investment Management Accounts and Private Funds. Individual Investment Management Account and Private Fund clients are sent proxy materials directly through a proxy forwarding service. As the client is responsible for voting their proxies, clients cannot direct Saturna to vote in a particular solicitation. Clients may contact their portfolio manager at Saturna's toll free number, 800/SATURNA, to discuss voting issues at their discretion.

Saturna does vote proxies for mutual fund portfolios it manages. Please see a specific Fund's Statement of Additional Information for a Fund's proxy voting guidelines. These documents are available on Saturna's website at [www.saturna.com](http://www.saturna.com).

## **Client Information Provided to Portfolio Managers**

All Investment Management Account clients complete the Saturna Investment Management Agreement, which details the terms of our relationship. Clients may provide personal information to Saturna that will assist their portfolio manager in making suitable choices in the selection of securities and investments. This information may include, but is not limited to, current income, assets owned, and net worth. Should a client elect to use SBS as broker, the brokerage application completed by the client contains detailed information about client's financial situation, current employment, beneficiary information, and other relevant information. Clients are encouraged to update this information whenever a significant change occurs.

## **Client Contact with Portfolio Managers**

There are no restrictions placed on a client's ability to contact and consult with portfolio managers. Review meetings are held as requested by clients. Clients are sent written trade confirmations on trade date. Clients receive written statements of the activity in their accounts after the end of each month from Saturna. Clients receive quarterly invoices on their accounts, showing the value of their accounts, after the end of each quarter. Clients may review their Pershing-custodied accounts online at any time.

## **Disciplinary Information**

The SEC mandates the disclosure of certain legal and disciplinary events that are material to your evaluation of Saturna as an investment adviser.

As part of our Core Values, Saturna places a high value on protecting our reputation and has no such events to report.

## **Other Financial Industry Activities and Affiliations**

As part of our Core Values, and to obtain a competitive advantage, Saturna builds operations internally, preferring in-house over outsourcing.

### **Mutual Funds**

Saturna serves as investment adviser to two families of mutual funds: Amana Mutual Funds Trust and Saturna Investment Trust (the “Trusts”). See the Advisory Business section for more information about the Trusts. Saturna has established policies and procedures designed to facilitate the equal application of Saturna’s fiduciary responsibilities among all of its clients despite any affiliations, such as this, that may create a conflict of interest.

### **Saturna Brokerage Services, Inc.**

SBS, established in 1986, is a wholly owned subsidiary of Saturna. All of SBS’s registered representatives are also employees of Saturna. In turn, most of Saturna’s employees are registered representatives of SBS. All employees, in keeping with our Core Values, receive no commissions or other incentives based on brokerage account activity.

SBS serves individual investors as well as professionally managed trading accounts. SBS acts as a brokerage agent and fully discloses all compensation. Neither Saturna nor SBS interposes itself between the customer and the best market.

SBS distributes the Funds and collects a distribution, or 12b-1, fee from the investor classes of those Funds that have one.

SBS does not charge commissions on transactions effectuated on behalf of Saturna’s investment management accounts. This practice works to mitigate any potential conflict of interest arising from Saturna’s ownership of SBS.

Pershing LLC is SBS’s clearing broker and provides custody services. Securities held at Pershing are protected by the Securities Investor Protection Corporation (“SIPC”), plus an excess SIPC policy paid for by Pershing.

SBS is a member of the Financial Industry Regulatory Authority (FINRA) (CRD #18437; SEC File Number 8-36588), SIPC, and the Securities Industry and Financial Markets Association (SIFMA).

### **Saturna Sendirian Berhad**

Saturna Sdn. Bhd. (“SSB”), located in Kuala Lumpur, Malaysia, is a wholly owned subsidiary of Saturna and is Saturna’s direct source for investment research and analysis on markets throughout Asia. Strategically located in the heart of one of the world centers of Islamic finance, SSB seeks to meet the growing international demand for Islamic investment management expertise.

Licensed by the Securities Commission of Malaysia, SSB provides equity management services to individuals, corporations, and institutions, specializing in Islamic investing. SSB is the fund manager for the Saturna ASEAN Equity Fund and the ICD Global Sustainable Fund, which are not available to US investors.

Both Saturna and SSB execute orders for their clients. To the extent they execute orders in the same security on the same day, clients could receive differing prices.

Additional details are available at [www.saturna.com.my](http://www.saturna.com.my).

### **Saturna Trust Company**

Saturna Trust Company ("STC") is a wholly owned subsidiary of Saturna and offers a number of tax advantaged retirement programs, including 401(k), IRA, HSA, ESA, SEP and SIMPLE plans.

STC additionally offers a variety of flexible, low-cost administration and trust services designed to meet needs of families, charities, trusts, estates, and retirement plans. With headquarters in Henderson, Nevada, STC is advantageously positioned to allow clients to benefit from the asset-friendly nature of Nevada's trust laws. STC's priority is building long-lasting relationships with our clients, and assisting them in providing for their heirs in accordance with their wishes. STC complements the investment management services offered by Saturna. However, to minimize any potential conflicts of interest, we are willing to work with any trust services provider of your choosing.

STC serves Saturna's retirement accounts as trustee and collects a fee for this service.

Additional details are available at [www.saturnatrust.com](http://www.saturnatrust.com).

Saturna does not recommend or select other investment advisers for our clients.

### **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

All Saturna employees are subject to a Code of Ethics, adopted pursuant to SEC Rule 204A-1. Saturna's Code of Ethics seeks to ensure that we place our clients' interest above our own. It is written to ensure that we avoid even the appearance of impropriety, and to ensure that no employee takes advantage of our positions or our access to information. The Code of Ethics also prohibits Saturna employees from providing or accepting any gifts or excessive entertainment to or from a client, prospective client, or any person or entity that seeks to do business with Saturna beyond minimal limits.

A copy of the Code of Ethics is available to any client or prospective client free upon request, and on the Saturna website ([www.saturna.com](http://www.saturna.com)). All transactions by employees are reported under the Code of Ethics and monitored

by its Chief Compliance Officer. Violations of the Code of Ethics can result in censure, fines and/or dismissal of any employee.

When appropriate, Saturna may invest client assets in affiliated mutual funds, for which Saturna and SBS collect management and distribution fees. To avoid “double-dipping” and to minimize potential conflicts of interest, Saturna excludes from the amount on which Saturna’s advisory fees are computed client assets invested in mutual funds that Saturna manages or for which Saturna receives a distribution fee or other payment.

With the exception of affiliated mutual funds, Saturna does not buy or sell for itself securities that are also recommended to clients. Employees of Saturna hold securities, or types of securities, that are also recommended to clients. Saturna’s Code of Ethics seeks to minimize this conflict of interest.

## **Review of Accounts**

Portfolio managers review all Investment Management Accounts on a periodic basis. The portfolio managers that review accounts are: Nicholas Kaiser, Chairman and Portfolio Manager; Jane Carten, Chief Executive Officer and Portfolio Manager; Scott Klimo, Chief Investment Officer and Portfolio Manager; Phelps McIlvaine, Vice President and Portfolio Manager; Monem Salam, Executive Vice President and Portfolio Manager; Patrick Drum, Senior Investment Analyst and Portfolio Manager; Bryce Fegley, Senior Investment Analyst and Portfolio Manager; Christopher Paul, Senior Investment Analyst and Portfolio Manager; Christopher Lang, Senior Investment Analyst and Portfolio Manager; Elizabeth Alm, Senior Investment Analyst and Portfolio Manager; and Levi Stewart Zurbrugg, Senior Investment Analyst and Portfolio Manager. Review meetings are held as requested by clients.

Clients are sent written trade confirmations on trade date. Clients receive written statements of the activity in their accounts after the end of each month from Saturna and from their independent custodian. In addition, at quarter end, clients receive invoices displaying the value of their accounts. Clients may review their Pershing-custodied accounts online at any time.

## **Client Referrals and Other Compensation**

Saturna does not receive and prohibits its employees from accepting any form of compensation for client referrals from any entity in conjunction with the advisory services it provides.

## **Financial Information**

Saturna bills clients in accordance with its process described in the Services, Fees and Compensation section.

Saturna is not subject to any financial condition that is reasonably likely to impair its ability to meet contractual commitments to its clients. As part of our Core Values, Saturna prepares for the unforeseen through planning and retaining a substantial portion of our earnings.

Saturna's June 30, 2020 annual report, with audited financial statements, is available on-line at [www.saturna.com](http://www.saturna.com) and free upon request.