



Code of Ethics

Sarasota Capital Strategies, Inc. (SCS) has adopted a Code of Ethics expressing the firm's commitment to Ethical conduct. SCS's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and sets forth SCS's practice of supervising the personal securities transactions of supervised personal with access to client information. Individuals associated with SCS may buy or sell securities for their personal accounts identical to or different than those recommended to clients. It is the expressed policy of SCS that no person employed by SCS shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on the investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, SCS requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer. SCS requires such access personas to also receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

SCS requires that all individuals must act in accordance with all Applicable Federal and State regulations governing registered investment advisory practices. SCS's Code of Ethics further includes that firm's policy prohibiting the use of material non-public information. Any individual not in observance of the above may be subject to discipline.

These principles of the Code express the profession's recognition of its responsibilities to the public, to clients, to colleagues, and to employers. The following code of ethics applies to all associates of Sarasota Capital Strategies, Inc.

Integrity

Sarasota Capital Strategies associates shall be objective in providing professional services to clients.

Competence

Sarasota Capital Strategies associates shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the associate is engaged.

Fairness

Sarasota Capital Strategies associates shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers and shall disclose conflict(s) of interest(s) in providing such services.

Confidentiality

Sarasota Capital Strategies associates shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process.

Professionalism

Sarasota Capital Strategies associates shall conduct in all matters to reflect credit upon the profession.

Diligence

Sarasota Capital Strategies associates shall act diligently in providing professional services.