

Code of Ethics

Responsibility

It is the responsibility of all supervisory personnel to ensure that Keeler & Nadler Financial Planning and Wealth Management, LLC (“Keeler & Nadler”) and its Investment Adviser Representatives (“IAR”) conduct its business with the highest level of ethical standards and in keeping with its fiduciary duties to its clients.

Duty to Clients

Keeler & Nadler and its IARs have a duty to exercise its authority and responsibility for the benefit of its clients, to place the interests of its clients first, and to refrain from having outside interests that conflict with the interests of its clients. Keeler & Nadler and its IARs must avoid any circumstances that might adversely affect or appear to affect its duty of complete loyalty to its clients.

Prohibited Acts

- 1) Employing any device, scheme or artifice to defraud;
- 2) Making any untrue statement of a material fact;
- 3) Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading;
- 4) Engaging in any fraudulent or deceitful act, practice or course of business, or
- 5) Engaging in any manipulative practices.

Conflicts of Interest

Keeler & Nadler has a duty to disclose potential and actual conflicts of interest to their clients. All IARs have a duty to report potential and actual conflicts of interest to Keeler & Nadler. Gifts (other than de minimis gifts, which are usually defined as having a value under \$100.00) should not be accepted from persons or entities doing business with Keeler & Nadler.

Use of Disclaimers

Keeler & Nadler shall not attempt to limit liability for willful misconduct or gross negligence through the use of disclaimers.

Suitability

Keeler & Nadler/IAR shall only recommend those investments that are suitable for the client based upon the client's particular situation and circumstances. The client is responsible for immediately notifying Keeler & Nadler and/or their IAR of any changes in their situation or circumstances so that they can respond appropriately.

Duty to Supervise

Advisors Act Section 203 (e)(5) - Keeler & Nadler is responsible for ensuring adequate supervision over the activities of all persons who act on its behalf. Specific duties include, but are not limited to:

- 1) Establishing procedures that could be reasonably expected to prevent and detect violations of the law by Keeler & Nadler personnel;
- 2) Analyzing its operations and creating a system of controls to ensure compliance with applicable securities laws;
- 3) Ensuring that all Keeler & Nadler personnel fully understand Keeler & Nadler's policies and procedures, and;
- 4) Establishing a review system designed to provide reasonable assurance that Keeler & Nadler's policies and procedures are effective and that they are being followed.

Personal Securities Transactions

Keeler & Nadler has adopted procedures to implement the firm's policy on personal securities transactions and reviews to monitor and insure that the firm's policy is observed, implemented properly and amended or updated, as appropriate. These procedures include the following:

To address this conflict of interest, Investment Advisor Representatives, and Management, will adhere to the following procedures regarding their personal trading:

- 1) The Company will maintain a list of its Access/Related Persons;
- 2) Access persons are required to submit Initial and Annual holdings reports to the Chief Compliance Officer;
- 3) Access persons are required to submit quarterly transaction reports;
- 4) Personnel must receive approval from the Chief Compliance Officer regarding the purchase of IPO's and Limited Offerings;
- 5) Clients' orders will always take precedence over orders placed for the Company, its Investment Advisor Representatives or the Company's Management, and
- 6) Neither Keeler & Nadler clients nor Investment Advisor Representatives or Keeler & Nadler Financial Planning and Wealth Management, LLC's Management will have enough funds invested in any given security to move the market in that particular security.

A. Investing Personal Money in the Same Securities as Clients

From time to time, Keeler & Nadler Financial Planning and Wealth Management, LLC may invest in the same security as those that are recommended to the client. This may cause a conflict of interest. To address this issue, the firm has established the above-referenced procedure. Additionally, Keeler & Nadler will always process the client's transactions before their own when similar or the same securities are being bought or sold, and no transactions by Keeler & Nadler will be permitted to disadvantage clients.

B. Trading Securities At or Around the Same Time as Clients' Securities

Our supervised persons are not permitted to recommend securities to clients at or about the same time that the Investment Advisor Representative (or another supervised person associated with the Investment Advisor Representative) buys or sells the same securities for their own account(s). In addition, Investment Advisor Representatives are not permitted to use discretionary trading authority on behalf of clients to buy or sell securities at or about the same time that the Investment Advisor Representative (or another supervised person associated with the Investment Advisor Representative) buys or sells the same securities for their own account(s).

C. Trades with Clients

In the event Keeler & Nadler Financial Planning and Wealth Management, LLC engages in agency cross or principal transactions with its clients, it will only do so with a written confirmation at or before the completion of each such transaction containing:

1. A statement and/or document describing the nature of the transaction and the conflict of interest;
2. The date and time of the transaction;
3. The source and amount of remuneration received by or to be received by the Company; and
4. That the client's authorization may be revoked at any time prior to completion of the transaction.

Keeler & Nadler Financial Planning and Wealth Management, LLC may maintain its own accounts and may buy and sell securities for its own account or the accounts of its principals. The advice given and the actions taken with respect to a client and to Keeler & Nadler Financial Planning and Wealth Management, LLC's own accounts may differ from advice given or the timing and nature of actions taken with respect to other client accounts.