



LESKO SECURITIES, INC.

A Subsidiary of Lesko Financial Services, Inc.

CODE OF ETHICS

INTRODUCTION:

From its founding, Lesko Securities, Inc. ("LSI") has insisted that the company and its employees maintain the highest degree of ethical standards and put clients' interests first. Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act") requires all investment advisors registered with the Securities and Exchange Commission ("SEC") to adopt codes of ethics that set forth standards of conduct and require compliance with federal securities laws. Lesko Securities, Inc. (LSI) requires this Code of Ethics to be followed by all of its Financial Professionals ("FPs").

INTEGRITY:

FPs shall put clients' interests ahead of their own and provide services with integrity. Integrity demands honesty and candor, which will not be subordinated to personal gain and advantage. FPs shall observe not only the letter but also the spirit of this Code.

OBJECTIVITY:

FPs shall be objective in providing services to clients and avoid subordination of judgment to others.

COMPETENCE:

FPs shall maintain the highest standards of professional competence and always seek to give the best possible advice to clients by working to maintain and improve professional knowledge, skills, and competence through continuing education, both formal and informal. Members shall not provide advice in areas where they are not capable.

FAIRNESS AND DISCLOSURE:

FPs will provide services that are fair and reasonable to clients and fully disclose costs, method of compensation, and potential conflicts of interest.

CONFIDENTIALITY:

FPs shall not disclose any confidential client information without client authorization unless required by applicable law or regulation or in response to legal or regulatory process. LSI members shall treat all documents with care and take care when disposing of them.

PROFESSIONALISM:

FPs shall conduct themselves in a way that would be a credit to the financial planning profession, treating all people with honesty, courtesy and respect.

DILIGENCE:

FPs shall provide services in a reasonably prompt, timely and thorough manner.