

The mission of JHS Capital Advisors, Inc. and its subsidiaries (which are referred to collectively in this Code as the “Company”) is to help, direct and support our clients’ financial needs. Our goal is that every client will be informed of their financial needs and wealth management due, in part, to the services provided by the Company. All of our officers, directors, and financial advisors, hold important and elevated roles in corporate governance. They are uniquely capable and empowered to ensure that all stakeholders’ and clients’ interests are appropriately balanced, protected and preserved. This Code provides principles to which these individuals, as well as all of our employees and financial advisors are expected to adhere and advocate. They embody rules regarding individual and peer responsibilities to the Company, the company’s clients, the public and other stakeholders. Violations of the Code of Ethics may subject employees and advisors to censure, suspension or termination.

Each of the officers and directors, as well as all other employees and advisors of the Company, and its subsidiaries, shall:

1. Avoid actual or apparent conflicts of interest in personal and professional relationships. A “conflict of interest” occurs when an individual’s private interest interferes in any way – even appears to interfere – with the interests of the Company as a whole. A conflict situation can arise when an advisor, employee, officer or director takes actions or has interests that may make it difficult to perform his or her company work objectively and effectively. Conflicts of interest also arise when an advisor, employee, officer or director, or member of his or her family, receives personal benefits as a result of his or her position in the company. In the event that anyone subject to this Code has reason to believe that he or she, or any member of his or her immediate family, may have a personal interest in a material transaction or relationship involving the Company or any of its subsidiaries, either current or proposed, that reasonably could be expected to conflict with the interests of the Company or one of its subsidiaries, he or she shall inform the Company Compliance Officer promptly of such personal interest. In the event that such person has reason to believe that his or her Compliance Officer or Supervisory Person or a member of the one’s immediate family, also may have a personal interest in the transaction or relationship, then such person instead shall report his or her personal interest to General Counsel or Chief Financial Officer of the Company. All material transactions and relationships involving a potential conflict of interest for any executive officer or director of the Company must be approved in advance by the Board of Directors of the Company, as provided below. Those involving other advisors or employees may be approved by the Compliance Officer or the General Counsel or Chief Financial Officer of the Company to whom such employee is required to report the conflict of interest, as set forth above, provided that such officer determines that approval of the same is in the best interests of the Company.

2. Champion integrity every minute, everyday. Not just when you fear someone is watching, but when you fear no one is. This requires more than just adherence, sincerity and candor in accordance with the rules and regulations of our industry. This is a higher calling to all that is right and good.
3. Endeavor to deal fairly with the Company's customers, suppliers, competitors and employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.
4. Proactively promote ethical behavior as a responsible and efficient use only for legitimate business purposes.
5. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing ones' independent judgment to be subordinate.
6. Respect and maintain the confidentiality of information about the Company and its customers and suppliers, acquired in the course of his or her work except when authorized or otherwise legally obligated to disclose. Confidential information includes all non-public information that might be of use to competitors, or harmful to the company or its customers, if disclosed. Confidential information acquired in the course of one's work may not be used for personal advantage.
7. Advance the legitimate interests of the Company whenever the opportunity to do so arises.
8. Provide full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to FINRA or the Securities and Exchange Commission and in other public communications made by the Company.
9. Comply with all applicable laws, rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies, including insider trading laws and the United States Foreign Corrupt Practices Act of 1977 (and amendments) ("FCPA"). The FCPA reaches conduct occurring outside of the territorial boundaries of the United States and applies to domestic and foreign subsidiaries of the Company and to both U.S. citizens and non-U.S. citizens. Under this act:
 - a. The Company and its shareholders, directors, agents, officers, advisors and employees are prohibited from making or authorizing payment of either money or anything of value, directly or indirectly, to non-United States government officials, political parties or candidates for political office outside the United States to win or retain business or influence any act or decision of such officials.

- b. All books, records and accounts, domestic and overseas, must accurately and fairly reflect business transactions and dispositions of the Company's assets.
 - c. A system of internal accounting controls must be maintained to provide adequate corporate supervision over the accounting and reporting activities at all levels.
 - d. Certain payments and gifts to non-United States employees whose duties are essentially ministerial or clerical may be permissible. It is often difficult to determine the legality of such payments under local law at a given location. You must consult with the Company's Corporate Counsel in Tampa before authorizing or making any such payment.
10. Follow the Firm's commission and fee guidelines and only charge appropriate fees and commissions depending on the size of the trade, type of trade or account. All postage and handling fees must be disclosed to the customer prior to all trades.
11. Understand it is of great importance to Company that it does not inadvertently infringe on the rights of others by receiving proprietary information belonging to other people, such as any previous employer. As such, you agree that you will not convey or use in the performance of your duties information which you know or reasonably suspect to constitute trade secrets or computer programs, inventions and the like belonging to anyone other than you or the Company, including but not limited to open source software. You promise to disclose whether any confidential information or proprietary technology you use in performing your duties for Company belongs to someone other than you or Company.
12. Share knowledge and maintain skills important and relevant to specific needs.

Advisors, employees, officers and directors are prohibited from (a) taking for themselves personally opportunities that are discovered through the use of corporate property, information or position; (b) using corporate property, information, or position for personal gain; and (c) competing with the Company.

In order to ensure that material transactions and relationships involving a potential conflict of interest for any executive officer or director of the Company are in the best interests of the Company, all such conflicts of interest shall be reported to the Board of Directors, and the approval of the Board of Directors must be obtained in advance for the Company to enter into any such transaction or relationship. No officer, advisor or employee of the Company may, on behalf of the Company, authorize or approve any transaction or relationship, or enter into any agreement, in which such officer or any member of his or her immediate family, may have a personal interest without such Board approval. Further, no officer, advisor or employee of the Company may, on behalf of the Company, authorize or approve any transaction or relationship, or enter into any agreement, if they are aware that an executive officer or a director of the Company, or any member of any such person's family, may have a personal interest in such transaction or relationship, without such Board approval.

Each waiver of a provision of this Code of Ethics, and each material transaction and relationship involving a conflict of interest for an executive officer or director of the Company which is approved by the Board of Directors must be disclosed to the shareholders of the Company in the periodic reports filed by the Company with the Securities and Exchange Commission, or FINRA, pursuant to the rules of the respective Commissions.

Advisors and employees are encouraged to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation. Additionally, employees should report violations of laws, rules, regulations or this Code of Ethics to the Company's General Counsel. The Company will not allow retaliation for reports made in good faith.

ANNUAL CERTIFICATION

On an annual basis (each December), the Company will require the Chief Executive Officer, the Chief Financial Officer, Financial Advisors and employees to certify that they are aware of and in compliance with this Code of Ethics.

ANNUAL CERTIFICATION REGARDING CODE OF ETHICS OF JHS CAPITAL HOLDINGS, INC. AND ITS SUBSIDIARIES

I, _____, have read and understand the JHS Capital Advisors, Inc. Code of Ethics. Furthermore, by my signature below, I certify that I am now, and at all times in the past twelve months have been, in compliance with the Code of Ethics.

Name: _____

Title: _____

Date: _____