

Code of Ethics

Balanced Wealth Strategies LLC

INTRODUCTION

Balanced Wealth Strategies, LLC ("BWS" or the "Firm") has adopted this Code of Ethics (the "Code") to comply with Rule 204A-1 under the Investment Advisers Act of 1940 (the "Advisers Act") and to reflect our commitment to the highest standards of ethical conduct and fiduciary duty to our clients. As a registered investment advisor, BWS has a fiduciary obligation to act in the best interests of our clients, with integrity, honesty, and transparency.

This Code of Ethics establishes the standards of business conduct for all supervised persons at BWS and addresses personal securities transactions, reporting requirements, and the prevention of misuse of material non-public information. The Code is designed to protect our clients by deterring misconduct and promoting:

- Honest and ethical conduct
- Full, fair, accurate, and timely disclosure
- Compliance with applicable laws and regulations
- Prompt internal reporting of violations.
- Accountability for adherence to the Code

1. FIDUCIARY STANDARDS AND BUSINESS CONDUCT

1.1 Fiduciary Duty

BWS recognizes that we serve in a position of trust and confidence for our clients. Consistent with our value proposition of "Your Legacy, Our Priority," all supervised persons must:

- Place client interests ahead of their own personal interests.
- Act with the utmost good faith and loyalty.
- Provide full and fair disclosure of all material facts.
- Seek to avoid conflicts of interest, and when conflicts cannot be avoided, provide full disclosure and act with transparency.
- Fulfill the duty of care by making suitable recommendations based on clients' financial situations, needs, and objectives.
- Maintain the confidentiality of client information.

1.2 Professional Conduct

All supervised persons must adhere to the following standards of professional conduct:

- Act with integrity, competence, dignity, and in an ethical manner when dealing with clients, the public, and colleagues.
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, and taking investment actions.
- Practice and encourage others to practice in a professional and ethical manner.
- Promote the integrity of and uphold the rules governing capital markets.
- Maintain and improve their professional competence through continuing education.

2. COMPLIANCE WITH FEDERAL SECURITIES LAWS AND STATE PROFESSIONAL STANDARDS

All supervised persons must comply with applicable federal securities laws, including:

- The Securities Act of 1933
- The Securities Exchange Act of 1934
- The Investment Advisers Act of 1940
- The Investment Company Act of 1940
- The Sarbanes-Oxley Act of 2002
- The Dodd-Frank Wall Street Reform and Consumer Protection Act
- All applicable rules and regulations adopted by the Securities and Exchange Commission (SEC)
- All applicable state securities regulations

2.1 Compliance with State CPA Ethical Standards

Balanced Wealth Strategies is committed to upholding the highest professional standards in all jurisdictions where we operate. The firm and all supervised persons who hold CPA credentials will:

- Comply with the New Hampshire Board of Accountancy's operating and ethical standards, including completing all required ethics continuing professional education (CPE)
- Adhere to the Florida Board of Accountancy's ethical requirements, including completion of all mandated Florida-specific ethics courses.
- Maintain the core values of the accounting profession including objectivity, integrity, professional competence, due care, and confidentiality.
- Remain current on all state-specific ethics requirements through regular training and education.

Supervised persons are required to understand their obligations under these laws and professional standards as they relate to their duties at BWS.

3. PERSONAL SECURITIES TRANSACTIONS AND HOLDINGS

3.1 Access Persons

For purposes of this Code, "Access Persons" include:

- All officers and directors of BWS
- All employees who have access to nonpublic information regarding clients' securities transactions
- All employees who are involved in making securities recommendations to clients
- Any person who has access to nonpublic information regarding the portfolio holdings of any client

3.2 Initial Holdings Reports

Access Persons must submit to the Chief Compliance Officer (CCO) an initial holdings report within 10 days of becoming an Access Person. The report must include:

- The title and type of security, exchange ticker symbol or CUSIP, number of shares, and principal amount of each reportable security in which the Access Person has any direct or indirect beneficial ownership.
- The name of any broker, dealer, or bank with which the Access Person maintains an account.
- The date the report is submitted.

Information in the initial holdings report must be current as of a date no more than 45 days prior to becoming an Access Person.

3.3 Annual Holdings Reports

Access Persons must submit to the CCO an annual holdings report that contains the same information as the initial holdings report. This report must be submitted annually within 30 days of the end of each calendar year and must be current as of a date no more than 45 days prior to the date of submission.

3.4 Quarterly Transaction Reports

Access Persons must submit to the CCO quarterly securities transaction reports within 30 days of the end of each calendar quarter. The report must include information about each transaction in a

reportable security in which the Access Person had any direct or indirect beneficial ownership, including:

- The date of the transaction, the title, and type of security, exchange ticker symbol or CUSIP, interest rate and maturity date (if applicable), number of shares, and principal amount
- The nature of the transaction (purchase, sale, or other)
- The price of the security at which the transaction was effected.
- The name of the broker, dealer, or bank with which the transaction was effected.
- The date the report is submitted.

3.5 Exceptions from Reporting Requirements

Access Persons are not required to submit:

- Reports with respect to securities held in accounts over which the Access Person had no direct or indirect influence or control.
- Transaction reports with respect to transactions effected pursuant to an automatic investment plan.
- Transaction reports if the report would duplicate information contained in broker trade confirmations or account statements that BWS holds in its records, provided that the firm receives the confirmations or statements no later than 30 days after the end of the applicable calendar quarter.

3.6 Pre-Approval for Certain Investments

Access Persons must obtain approval from the CCO before directly or indirectly acquiring beneficial ownership in any security in an initial public offering (IPO) or in a limited offering.

4. PROTECTING CONFIDENTIAL INFORMATION

4.1 Material Non-Public Information

All supervised persons are prohibited from trading, either personally or on behalf of others, while in possession of material, non-public information. Additionally, supervised persons are prohibited from communicating material non-public information to others in violation of the law.

4.2 Client Information Privacy

BWS respects the privacy of our clients and is committed to protecting their personal and financial information. All supervised persons must maintain confidentiality of client information and may not disclose such information to any third party without the client's consent, except as required by law or regulation.

5. GIFTS AND ENTERTAINMENT

5.1 Gifts Given

Supervised persons may not give any gift with a value in excess of \$100 per year to any person who does business with, or on behalf of, BWS or a client without the prior written approval of the CCO.

5.2 Gifts Received

Supervised persons may not accept any gift with a value in excess of \$100 per year from any person who does business with, or on behalf of, BWS or a client without the prior written approval of the CCO.

5.3 Entertainment

Supervised persons may provide or receive business entertainment (e.g., meals, tickets to sporting or cultural events) provided that the entertainment:

- Is not so frequent, extensive, or lavish as to raise questions of impropriety.
- Does not create the appearance of a conflict of interest.
- Is consistent with industry practices and BWS policies.
- Would not embarrass BWS if it were to be made public.

6. OUTSIDE BUSINESS ACTIVITIES

Supervised persons must obtain approval from the CCO before engaging in any outside business activity. Outside business activities include, but are not limited to:

- Being employed by another entity
- Serving as an officer, director, or partner of another entity
- Receiving compensation from another entity
- Serving as a trustee, executor, or in a similar fiduciary capacity

7. POLITICAL CONTRIBUTIONS

Supervised persons must pre-clear all political contributions with the CCO to ensure compliance with SEC Rule 206(4)-5 (the "Pay-to-Play Rule").

8. REPORTING VIOLATIONS

8.1 Reporting Requirement

All supervised persons are required to promptly report any violation or potential violation of this Code, including:

- Violations of the federal securities laws
- Violations of fiduciary duty or the Code
- Disclosure of material nonpublic information
- Dishonest or unethical business practices

8.2 Reporting Procedure

Violations should be reported to the CCO. If the CCO is involved in the violation, the report should be made to a senior officer of the firm. BWS will treat violation reports as confidential to the extent permitted by law and will not retaliate against any supervised person who reports a violation in good faith.

9. COMPLIANCE PROCEDURES

9.1 Distribution of the Code

The CCO will provide a copy of this Code to all supervised persons upon commencement of employment and annually thereafter. All supervised persons must provide a written acknowledgment of their receipt of the Code and any amendments.

9.2 Review of Securities Reports

The CCO will review all securities holdings and transaction reports to identify improper trading activities or patterns of trading.

9.3 Annual Compliance Certification

All supervised persons must certify annually that they:

- Have read and understand the Code.
- Have complied with all requirements of the Code.
- Have disclosed or reported all personal securities transactions required to be disclosed or reported under the Code.

9.4 Recordkeeping

BWS will maintain the following records:

- A copy of each Code that has been in effect during the past five years.



- A record of any violation of the Code and the action taken as a result of such violation for five years from the end of the fiscal year in which the violation occurred.
- A copy of each report made by an Access Person for at least five years.
- A record of all persons who are or were required to make reports during the past five years.
- A record of any decision and supporting reasons for approving the acquisition of securities by Access Persons in IPOs and limited offerings for at least five years after the end of the fiscal year in which approval was granted.

10. ENFORCEMENT AND SANCTIONS

Violations of this Code may result in disciplinary action, including:

- Verbal or written warnings
- Fines, disgorgement of profits, or other monetary sanctions
- Demotion or reassignment
- Suspension or termination of employment
- Referral to civil or criminal authorities where appropriate

The CCO will determine the appropriate sanction based on the nature and severity of the violation, the person's history of compliance, and whether the violation was intentional or inadvertent.

11. ADMINISTRATION

The CCO is responsible for administering this Code and is available to address questions regarding obligations under the Code. The CCO may grant written waivers of the provisions of this Code in appropriate circumstances.

Contact Information

Questions regarding this Code should be directed to: Chief Compliance Officer Balanced Wealth Strategies LLC Mark J Burger, 33 Blackberry Hill Road, Orford, NH 03777 or, 4440 PGA Boulevard, Suite 600, Palm Beach Gardens, FL 33410 Phone: 561-889-3503.

Effective Date and Revisions

Original Effective Date: 2/5/2025.

Next Review Date: 2/5/2026.