

Code of Ethics

Employment with Sharkey, Howes & Javer, Inc., carries with it a responsibility to be constantly aware of the fiduciary obligations owed our clients and understand the importance of ethical conduct. Employees must refrain from taking part in, or exerting influence on, any transaction or situation in which their own interests take precedence over the best interests of SHJ clients. All SHJ employees will receive and acknowledge the receipt of this Code of Ethics.

It is impossible in a general policy statement to define all the possible circumstances and relationships that could be considered unethical but the list below represents behavior and responsibilities that all employees of SHJ are required to embrace.

We clearly understand our fiduciary obligation and we adhere to the highest standard of truthfulness, integrity and trustworthiness. We put clients' interests ahead of firm interests.

We maintain confidentiality of our clients' information and circumstance.

We have an obligation to our clients to maintain the utmost good faith and provide full and fair disclosure of all material facts.

We will comply with all relevant Federal, State and local Rules, Regulations and Laws and the SHJ Policies and Procedures Manual.

Any violation of these policies will subject the employee to an immediate review and possible disciplinary action and/or termination. This Code of Ethics also requires any employee of SHJ to report, promptly, any violations of this Code of Ethics or the Policies and Procedures Manual to the firm's chief compliance officer or to any other officer, director or other designated person.

All employees are required to timely report, and the CCO will review, all personal securities transactions and holdings at least quarterly.

This Code of Ethics will be reviewed annually.