

WESTPORT RESOURCES MANAGEMENT

CODE OF ETHICS

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives should conduct themselves with integrity and dignity and act in an ethical manner in their dealings with the public, clients, customers, employers, employees, and fellow adviser representatives.

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives should conduct themselves and should encourage others to practice financial Investment Advisory services in a professional and ethical manner that will reflect credit on themselves and their profession.

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives should act with competence and should strive to maintain and improve their competence and that of others in the profession.

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives should use proper care and exercise independent professional judgment.

THE STANDARDS OF PROFESSIONAL CONDUCT

I. Compliance with Governing Laws and Regulations and the Code and Standards

A. Required Knowledge and Compliance

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall maintain knowledge of and shall comply with all applicable laws, rules, and regulations of any government, governmental agency, and regulatory organization governing their professional, financial, or business activities, as well as with these Standards of Professional Conduct and the accompanying Code of Ethics,

B. Prohibition Against Assisting Legal and Ethical Violations

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall not knowingly participate in, or assist, any acts in violation of any applicable law, rule, or regulation of any government, governmental agency, or regulatory organization governing their professional, financial, or business activities, nor any act which would violate any provision of these Standards of Professional Conduct or the accompanying Code of Ethics.

C. Prohibition Against Use of Material Nonpublic Information

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall

comply with all laws and regulations relating to the use and communication of material nonpublic information. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives' duty is generally defined as to not trade while in possession of, nor communicate, material nonpublic information in breach of a duty, or if the information is misappropriated,

Duties under the Standard include the following: (1) If the Investment Advisor representative acquires such information as a result of a special or confidential relationship with the issuer or others, he shall not communicate the information (other than within the relationship), or take investment action on the basis of such information, if it violates that relationship. (2) If the Investment Advisor representative is not in a special or confidential relationship with the issuer or others, he shall not communicate or act on material nonpublic information if he knows, or should have known, that such information (a) was disclosed to him, or would result, in a breach of a duty, or (b) was misappropriated.

If such a breach of duty exists, the Investment Advisor representative shall make reasonable efforts to achieve public dissemination of such information.

D. Responsibilities of Supervisors

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives with supervisory responsibility shall exercise reasonable supervision over those subordinate employees subject to their control so as to prevent any violation by such persons of applicable statutes, regulations, and provisions of the Code of Ethics or Standards of Professional Conduct. In carrying out his supervisory duties the Investment Advisor representative is entitled to rely upon reasonable procedures established by WESTPORT RESOURCES MANAGEMENT, LLC.

II. Research Reports, Investment Recommendations and Actions

A. Reasonable Basis and Representations

1. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall exercise diligence and thoroughness in making an investment recommendation to others or in taking an investment action for others.
2. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall have a reasonable and adequate basis for such recommendations and actions, supported by appropriate research and investigation.
3. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall make reasonable and diligent efforts to avoid any material misrepresentation in any research report or investment recommendation

4. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall maintain appropriate records to support the reasonableness of such recommendations and actions,

B. Research Reports

1. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall use reasonable judgment as to the inclusion of relevant factors in research reports,

2. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall distinguish between facts and opinions in research reports,

3. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall indicate the basic characteristics of the investment involved when preparing for general public distribution a research report that is not directly related to a specific portfolio or client.

C. Portfolio Investment Recommendations and Actions

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall, when making an investment recommendation or taking an investment action for a specific portfolio or client, consider its appropriateness and suitability for such portfolio or client. In considering such matters, WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall take into account (1) the needs and circumstances of the client, (2) the basic characteristics of the investment involved, and (3) the basic characteristics of the total portfolio. WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall use reasonable judgment to determine the applicable relevant factors and shall distinguish between facts and opinions in the presentation of investment recommendations.

D. Prohibition Against Plagiarism

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall not, when presenting material to their employer, associates, customers, clients, or the general public, copy or use in substantially the same form material prepared by other persons without acknowledging its use and identifying the name of the author or publisher of such material. The Investment Advisor representative may, however, use without acknowledgement factual information published by recognized financial and statistical reporting services or similar sources.

E. Prohibition Against Misrepresentation of Services

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall not make any statements, orally or in writing, which misrepresent (1) the services that the Investment Advisor representative or their firm is capable of performing for the client, (2) the qualifications of such Investment Advisor representative or their firm, (3) the

investment performance that the Investment Advisor representative or their firm has accomplished or can reasonably be expected to achieve for the client, or (4) the expected performance of any investment,

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall not make, orally or in writing, explicitly or implicitly, any assurances about or guarantees of any investment or its return except communication of accurate information as to the terms of the investment instrument and the issuer's obligations under the instrument

F. Fair Dealing with Customers and Clients

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall act in a manner consistent with their obligation to deal fairly with all customers and clients when (1) disseminating investment recommendations, (2) disseminating material changes in prior investment advice, and (3) taking investment action.

III. Priority of Transactions

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall conduct themselves in such a manner that transactions for their customers, clients, and employer have priority over personal transactions, and so that their personal transactions do not operate adversely to their interests. If an Investment Advisor representative decides to make a recommendation about the purchase or sale of a security or other investment, he shall give his customers, clients, and employer adequate opportunity to act on the recommendation before acting on their behalf.

IV. Disclosure of Conflicts

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives, when making investment recommendations, or taking investment actions, shall disclose to their customers and clients any material conflict of interest relating to them and any material beneficial ownership of the securities or other investments involved that could reasonably be expected to impair their ability to render unbiased and objective advice.

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall disclose to the President all matters that could reasonably be expected to interfere with their duty to the firm, or with their ability to render unbiased and objective advice.

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall also comply with all requirements as to disclosure of conflicts of interest imposed by law and by rules and regulations of organizations governing their activities and shall comply with any prohibitions on their activities if a conflict of interest exists.

V. Securities Transactions of Access Persons

A. Personal Securities Trading

Our Code of Ethics requires that all persons associated with our firm report their personal securities transactions and holdings to the firm's Chief Compliance Officer. The Chief Compliance Officer, in turn, is required to review these transactions and holdings. This policy will be met by having duplicate statements for all associated persons and their spouses and any persons dependent on the associated person for financial support sent to the Chief Compliance Officer. Further, any accounts that persons wish to open away from our affiliated Broker, Westport Resources Investment Services, must receive prior written approval. In every situation, the interest of our clients comes first. The firm retains the right to impose "blackout periods" if necessary if client transactions are to be implemented and any associated person's trades could interfere with the clients' interests. The following are securities accounts that are maintained for the persons above:

Name of Account	Institution Where Held	Account Number

Please add any additional accounts on a separate page.

B. Initial Public Offerings and Private Placements

All persons must obtain the firm's approval before investing in an initial public offering (IPO) or private placement. There must never be a question as to whether these opportunities are being taken when the firm's clients could have benefited.

VI. Compensation

A. Disclosure of Additional Compensation Arrangements

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall inform their customers, clients, and employer of compensation or other benefit arrangements in connection with services which are in addition to compensation from them for such services.

B. Disclosure of Referral Fees

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall make appropriate disclosure to a prospective client or customer of any consideration paid or other benefit delivered to others for recommending their services to that prospective client or customer.

C. Duty to Firm

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall not undertake independent practice for compensation or other benefit in competition with the firm unless he has received written consent from both WESTPORT RESOURCES MANAGEMENT and the person for whom he undertakes independent employment,

VII. Relationships with Others

A. Preservation of Confidentiality

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall preserve the confidentiality of information communicated by the client concerning matters within the scope of the confidential relationship, unless the Investment Advisor Representatives receives information concerning illegal activities on the part of the client.

B. Maintenance of Independence and Objectivity

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives, in relationships and contacts with an issuer of securities, whether individually or as a member of a group, shall use particular care and good judgment to achieve and maintain independence and objectivity.

C. Fiduciary Duties

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives, in relationships with clients, shall use particular care in determining applicable fiduciary duty and shall comply with such duty as to those persons and interests to whom it is owed,

VIII. Use of Professional Designation

The qualified financial Investment Advisor representative may use, as applicable, the professional designation "Member of the Association for Investment Management and Research", " Member of the Financial Adviser Representatives Federation", and " Member of the Institute of Chartered Financial Adviser representatives", and is encouraged to do so, but only in a dignified and judicious manner, The use of the designations may be accompanied by an accurate explanation (1) of the requirements that have been met to obtain the designation, and (2) of the Association for Investment Management and Research, the Financial Adviser Representatives Federation, and the

Institute of Chartered Financial Adviser representatives, as applicable.

The Chartered Financial Investment Advisor representative may use the professional designation "Chartered Financial Investment Advisor representative", or the abbreviation "CFA", and is encouraged to do so, but only in a dignified and judicious manner. The use of the designation may be accompanied by an accurate explanation (1) of the requirements that have been met to obtain the designation, and (2) of the Association for Investment Management and Research, and the Institute of Chartered Financial Adviser representatives,

IX. Professional Misconduct

WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives shall not (1) commit a criminal act that upon conviction materially reflects adversely on their honesty, trustworthiness or fitness as WESTPORT RESOURCES MANAGEMENT Investment Advisor Representatives in other respects, or (2) engage in conduct involving dishonesty, fraud, deceit or misrepresentation.

I have read the Code of Ethics for WESTPORT RESOURCES MANAGEMENT and agree to abide by the terms set forth therein.

Date _____

Signature of Investment Advisor Representative: _____