

Ethical Code and Conduct

This document describes our policy relating to the professional and ethical standards in financial services that are required by the company.

The FCA's [CII Code of Ethics](#) is copied here. Check for currency online.

This policy is designed to work in conjunction with the following policies:

- [Whistleblowing Policy](#)
- [Anti-Bribery and Corruption Policy](#)
- [Conflicts of Interests Policy](#)
- [Complaints Policy](#)
- [Treating Customers Fairly \(TCF\) Policy](#)

Revision History and Control

	A	B	C	D	E	F
1	Revision	Date	Status	Reason(s) for change	Who	Notes
2	01/001	12/3/2018	Draft	New Policy Document	Sue Drake	<i>SD drafted policy</i>
3	01/002		Approved			Compliance Approval
4	01/003	May 2020	Revised	Update, new format	Sian Elmore	as per advice from compliance consultant
5	01/003	May 2020	Approved		Dave George	

Policy Owner(s) and Key Individuals

	A	B	C	D
1		Name	Job Role	Notes
2	Policy owner	Dave George	CEO	
3	Relevant persons	Sue Drake	Finance	Compliance officer until mid-2019
4		Sian Elmore	EA to CEO	

1. Introduction

This firm encourages the highest professional and ethical standards in financial services in all its employees. This firm looks to all its employees to meet these standards and to maintain the reputation of the company by following this Code of Ethics and Conduct (the Code). It sets down the principles, which all employees should follow in the course of their professional duties.

All employees are obliged to comply with this Code. Adherence to this Code of Ethics will allow us to deliver a high-quality service to its clients in a most professional manner.

The key values, which set the standards for the behaviour of all Employees in respect of the key stakeholders in sections 2 to 5 are:

- Behaving with responsibility and integrity in their professional life and considering their wider responsibilities to society. Acting in a courteous, honest and fair manner towards anyone they deal with. Being trustworthy and

never putting their interests or the interests of others above the legitimate interests of their stakeholders; Always paying due regard to the interests of their customers and treating them fairly.

- Complying with all relevant Laws and meeting the requirements of all applicable regulatory authorities. Being open and co-operative with the FCA and other regulators.
- Demonstrating professional competence and due care including:
 - Meeting the technical and professional standards relating to their level of qualification, role and position of responsibility.
 - Completing their duties with due skill, care and diligence.
- Upholding professional standards in all dealings and relationships; observing proper standards of market conduct.
- Respecting the confidentiality of information.
- Applying objectivity in making professional judgements and in giving opinions and statements, not allowing prejudice or bias or the influence of others to override objectivity.

An employee operating in a professional capacity has duties, arising from these key values, to several different groups. Within these relationships an employee should always act ethically, and their behaviour and conduct should meet the following principles

2. Key value - Relations with customers

Employees will always seek to earn and maintain the trust of their customers and should:

1. Act in the best interests of each client. Obtain and provide all the relevant information, including all necessary documentation to enable the client to make an informed decision and respect the confidentiality of information.
2. Avoid conflict between personal interests, or the interests of any associated company, person or group of persons, and their duties to all customers.
3. Avoid conflict between any competing interests of one or more customer(s), stepping aside in one or all matters if such conflicts cannot be resolved.
4. Act at all times with due skill, care and diligence.
5. Act only within the limits of personal competence and any limits of authorisation.
6. Act in a financially honest and prudent manner, including ensuring the protection of any money and/or property held on behalf of customers; be transparent about fees and other costs.
7. Act openly, fairly and respectfully always, providing all customers with due respect, consideration and opportunity.
8. Be honest and trustworthy with customers and communicate with them in a clear, prompt and appropriate manner.
9. Provide suitable and objective recommendations to customers.
10. Comply with all Laws and Regulations regarding the supply of goods and services to customers.
11. Not provide or accept money, gifts, entertainment, loans or any other benefit or preferential treatment from or to any existing or potential customer or provider, other than occasional gifts, entertainment or remuneration, which are provided as part of accepted business practice, and which are not likely to conflict with duties to customers.

3. Key value - Relations in employment

Employees should aim to ensure good relations with their employer and other employees and should:

1. Avoid conflict between personal interests, or the interests of any associated company or person, and their duty

to their employer.

2. Not make improper use of information obtained as an employee or disclose, or allow to be disclosed, information confidential to their employer.
3. Seek to be a responsible employee and be honest and trustworthy at work.
4. Act openly, fairly and respectfully always, treating, colleagues, customers and suppliers with equal respect, consideration and opportunity
5. Aim to take every opportunity to improve their professional capability, knowledge and skills;
6. Accurately and completely account for and report in employer records all business dealings.
7. Not provide or accept money, gifts, entertainment, loans or any other benefit or preferential treatment from or to any existing or potential supplier or business associate, other than occasional gifts, entertainment or remuneration, which are provided as part of accepted business practice, provided this is not likely to conflict with any duty that is owed to their employer.

In addition, where an employee holds a position of influence within an organisation they should:

8. Provide, or encourage their employer to provide, suitable arrangements for the internal review of decisions, policies and actions where an employee raises concerns of unethical behaviour. (Employees should not be penalised for raising matters of ethical concern even if this results in a loss to the organisation or a customer).
9. Incorporate, or encourage their employer to incorporate, ethical standards into the organisation's governance standards, including the development of an ethical code.

(This part of the Code will operate alongside any employer policies, contracts and conduct documents. Where this part of the Code sets higher standards, the Code should be followed.)

4. Key value - Relations with Regulators and the Law

Employees must respect all Laws and abide by all Regulations that affect their business and must:

1. Ensure they operate within the Law and within the spirit of the Law, always.
2. Ensure they deal with regulators in an open, transparent and co-operative manner and meet any requirements correctly made of them.

5. Key value - Relations with the community and the public

Employees should recognise the important wider role that they play as professionals and should:

1. Seek to advance the reputation of financial services, financial planning, insurance and associated trades through their own conduct.
2. Operate in a way that respects environmental concerns and issues.
3. Act in a socially responsible manner within the societies in which they operate.
4. Strive to be trusted individuals and fulfil their responsibilities to the societies and communities in which they operate professionally.