### **SFAA Code of Ethical Conduct**

#### **Preamble**

The Swiss Financial Analysts Association SFAA founded 1962 is committed to the quality and integrity of the financial industry and to the ethical conduct of its members. The SFAA Code of Ethical Conduct embodies the main ethical key principles of this commitment. The aim of this Code of Ethical Conduct is to maintain and enhance the reputation of the financial service industry. Representing SFAA, all members commit adherence to these principles.

#### 1. Professionalism

Members exercise their profession in an independent, conscientious, and ethical manner and follow the highest standards of irreproachable conducts and activities applicable to the financial industry and its members. They always give priority to the respective best interests first and foremost of their clients but also of the employer whilst disclosing potential conflicts of interest.

## 2. Compliance with the applicable laws, rules and regulations

Members take all reasonable measures (including through continuous education) to learn, understand and adhere to all applicable provisions of the laws, rules, regulations and best practices relevant to their professional activities. In the event of a conflict, members adhere to the stricter law, rule and regulation.

### 3. Duties to clients

Members are committed to their clients and act with due care and diligence. They act for the benefit of their clients and place their interest before the interests of their employer's or their own interest. They take all reasonable measures to fully inform their clients about the products and services, the risks and the costs associated to such products and services but also disclose potential conflicts of interest so that the clients can take informed decisions.

### 4. Misrepresentation

Members fairly, accurately and completely present all relevant facts to avoid any misrepresentation. They only present information from reliable sources and transparently disclose the sources. They do not make any statements that could be misleading as to the products and services offered to clients and any other important facts relevant to their professional activities.

## 5. Suitability

Members assess and thoroughly document the suitability and the appropriateness of recommendations or actions for their clients whenever this is required by relevant regulations. In this context, they make reasonable inquiry into the financial situation of their clients and know their needs, financial objectives and constraints, and investment knowledge and experience (in general and about specific categories of financial products) in order to ensure that the clients receive a service and select an investment strategy and/or financial products which meet their needs. They do not push for a service, an investment strategy, or specific products without ensuring that their clients have the understanding and financial means to bear the risks associated with such service, investment strategy and products.

## 6. Independence and objectivity

Members take reasonable steps to maintain their independence and objectivity and make fair judgements when performing their professional activities. They do not compromise their own or another's independence and objectivity and take all reasonable measures necessary to maintain their independence and objectivity.

#### 7. Conflicts of interest

Members make full and fair disclosure of all matters that could reasonably be expected to impair their independence and objectivity or interfere with respective duties to their clients and their employer. They are encouraged to inform their supervisors or the internal control functions of their employer on any form of pressure related to their professional activities.

### 8. Duties to employers

Members act for the interest of their employer. They do not withhold their knowledge and skills from their employer, divulge confidential information, or otherwise damage their employer. They adhere to their contractual obligations towards their employer as well as towards the internal directives which they undertake to understand and apply.

# 9. Professional qualifications

Members are encouraged to disclose their professional qualifications to the clients. At the same time, they shall use their qualifications with due care. They enhance the standing and confidence in the profession, the qualifications and the related associations with their activities. They strive for continuous education to keep their qualifications up to date.

#### 10. Accountability

Members hold themselves accountable for the adherence to the principles of the Code of Ethical Conduct. They are encouraged to declare and raise concerns with their supervisors or the control functions of their employer if they are, or expect to be, in breach with these principles.