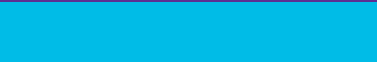




CFA Institute

ADOPTING THE ASSET MANAGER CODE



ABOUT THE CODE

The CFA Institute Asset Manager Code (the "Code"), available at www.cfainstitute.org/assetcode, is a global, voluntary, investor-focused code of professional conduct for firms managing investment assets. The Code embodies the fundamental ethical principles at the core of the investment management industry. More than 1,300 firms in 50 countries adopt the Code to demonstrate their commitment to best ethical practice.

"Asset managers have an opportunity to send a very strong signal of their commitment to ethical conduct that is so especially important."

—Michael G. Trotsky, CFA,

Executive Director and Chief Investment Officer,
MASSPrim

WHY COMPLY?

- Send a message to investors, regulators, and partners that the firm is **voluntarily operating under rigorous global ethical and professionals standards**
- Create a **strong reputation** for your firm's values that can **build investor confidence to retain and attract clients**
- Provide a **communication and promotional tool** to demonstrate the value the firm places on **protecting client interests**
- **Identify and address gaps** between firm processes and best practice
- Reinforce a **culture of integrity** among employees

COMPLYING WITH THE CODE

1. Compare the Code with Your Firm's Current Practices.

Review your firm's existing code of ethics, policies, and procedures and compare them to the provisions of the Code. CFA Institute provides a number of resources—including recommendations, guidance, and interpretations of the Code provisions—to help your firm claim compliance.

2. Make any Needed Revisions to Align with the Code.

Identify any gaps in your firm's existing practice and make revisions as needed. The flexible, principles-based Code allows your firm to develop policies and procedures to implement the provisions most appropriate to your circumstances. Many times, after undertaking the comparison, only incremental changes to existing policies are required to meet the provisions of the Code and allow a claim of compliance.

3. Claim Compliance by Notifying CFA Institute.

Complete the brief registration form at www.cfainstitute.org/assetcode.

"Being global is an especially valuable aspect of the Asset Manager Code, as we invest through the best managers on a global basis. Having the confidence that they adhere to the standard across the globe is critical."

—Mark Delaney, CFA,

Deputy Chief Executive and Chief Investments Officer,
AustralianSuper



CFA Institute

CFA Institute is a global community of more than 146,000 investment professionals working to build an investment industry where investors' interests come first, financial markets function at their best, and economies grow. In addition to the Asset Manager Code, we administer the Global Investment Performance Standards (GIPS®) and the widely respected Chartered Financial Analyst (CFA®) designation.

www.cfainstitute.org/assetcode
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