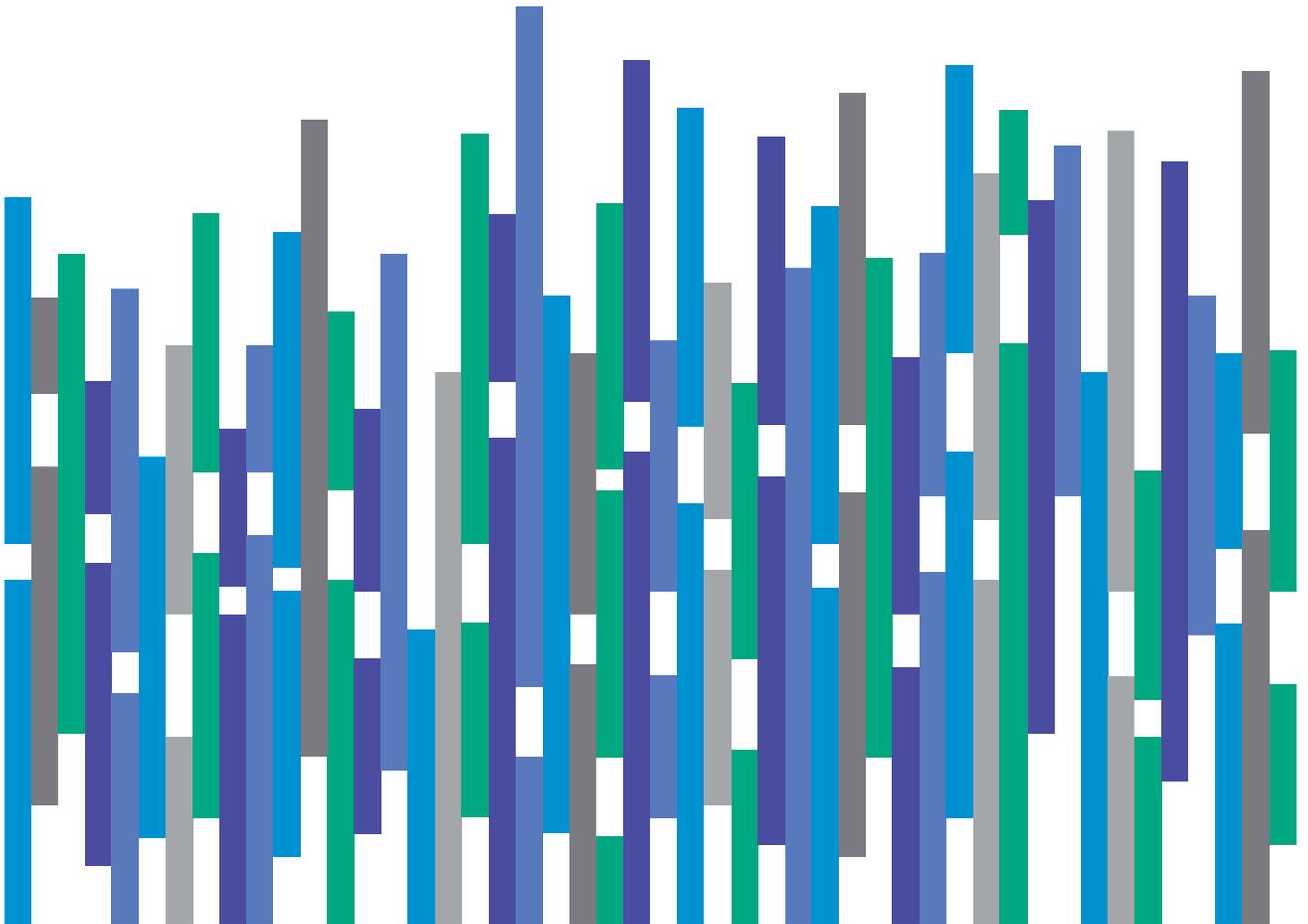


CFA Institute

# ASSET MANAGER CODE™

SAMPLE FORMS

JUNE 2020



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## SAMPLE FORMS

These sample forms are provided as guidance for how some common forms used in conjunction with the sample policies and procedures may look, when considering compliance with the CFA Institute Asset Manager Code™. Please note that these *are examples only* and not intended to replace any current forms you may be using. They should be used only as a reference.

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# EXHIBIT A – INITIAL AND ANNUAL HOLDINGS CERTIFICATION FORM

## XYZA Code of Ethics Initial and Annual Holdings Report Certification

Hire Date (*Initial Certification Only*): \_\_\_\_\_

Year Ending: \_\_\_\_\_

Holdings as of: \_\_\_\_\_

### **ACKNOWLEDGMENT**

I certify that I have received, read, understand, and agree to abide by the XYZA Code of Ethics (“**Code**”). I recognize that the Policies and Procedures described herein apply to me, and I agree to comply in all respects. I certify that I have reported all brokerage accounts and statements required to be reported under the *Code*. I also understand that the Firm will take appropriate disciplinary actions against me for violating such Policies as well as in the event of any other legal violations. Furthermore, I understand that any violation of the *Code of Ethics* may lead to serious sanctions, including dismissal from the Firm.

***Please check the appropriate box. If applicable, please attach your statements. It may be appropriate to check both the first and second boxes if you hold accounts or securities for which the Firm does not receive a regular account statement (e.g., limited offerings, IPOs, or a retirement account of prior employer).***

As of month/year-end date:

- I owned reportable securities\*. Copies of all my statements are already submitted to Compliance.
- I owned reportable securities\*. I have attached the statement(s) for the period ending \_\_\_\_\_ [date].
- I did not own any reportable securities\*.

*\* See Attachment A for the definition of “security” and “reportable security”.*

As of \_\_\_\_\_, the following lists any brokers, dealers, banks, or other custodians at which I held any securities\* for my direct or indirect benefit.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## ATTACHMENT A

### \*Definition of Reportable Security

For purposes of the *Code*, the Firm defines “**reportable security**” as defined in Section 3.j. of the Code of Ethics, except that it does NOT include:

- Government securities;
- Bankers’ acceptances, bank certificates of deposit, commercial paper, or high-quality short-term debt instruments, including repurchase agreements;
- Shares issued by money market funds;
- Shares issued by open-end funds other than reportable funds; and
- Shares issued by unit investment trusts that are invested exclusively in one or more open-end funds, none of which are reportable funds.
- Reportable accounts *may* include related persons or accounts for which the individual has beneficial ownership.

### \*\*Definition of Security

For purposes of the *Code*, the Firm defines a “**security**” as:

Any note; stock; treasury stock; security future; bond; debenture; evidence of indebtedness; certificate of interest or participation in any profit-sharing agreement; collateral-trust certificate; pre-organization certificate or subscription; transferable share; investment contract; voting-trust certificate; certificate of deposit for a security; fractional undivided interest in oil, gas, or other mineral rights; any put, call, straddle, option, or privilege on any security (including a certificate of deposit) or on any group or index of securities (including any interest therein or based on the value thereof); or any put, call, straddle, option, or privilege entered into on a national securities exchange relating to foreign currency; or, in general, any interest or instrument commonly known as a “security,” or any certificate of interest or participation in, temporary or interim certificate for, receipt for, guaranty of, or warrant or right to subscribe to or purchase any of the foregoing.

### Definition of Reportable Fund

We define a “**reportable fund**” as:

- (i) Any fund for which the Firm serves as an asset manager; or
- (ii) Any fund whose asset manager or principal underwriter controls the asset manager, is controlled by the asset manager, or is under common control with the asset manager.

# EXHIBIT B – SPECIAL REQUEST FORM — PERSONAL SECURITIES TRANSACTION APPROVAL

EMPLOYEE NAME: \_\_\_\_\_

DATE OF REQUEST: \_\_\_\_\_

- Request Due to Special Circumstances (e.g., estate liquidation, home purchase, or financial hardship)
- Request for Approval of Limited Offering or Initial Public Offering

## TYPE OF SECURITY

- Stock                       Option                       Closed-End or Non-broad-Based ETF
- Bond                         Closed-End Fund            Other: \_\_\_\_\_

## TRANSACTION DETAIL

Security Name \_\_\_\_\_

CUSIP/Ticker \_\_\_\_\_

Number of Shares/Par Value \_\_\_\_\_

Broker, Dealer, or Bank Name \_\_\_\_\_

Account Name \_\_\_\_\_

Account Number \_\_\_\_\_

Transaction Requested                       Buy                       Sell

Confirm Security Is Not on the Restricted List                       Confirmed

## REASON FOR REQUEST

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## APPROVAL (*Granted only for date approved*)

Compliance Approval \_\_\_\_\_

Date Approved \_\_\_\_\_

## EXHIBIT C – PERSONAL SECURITIES PRE-CLEARANCE AND REPORTING REQUIREMENTS

### You Must Pre-clear *and* Report the Following Transactions:

- American Depositary Receipts (ADRs)
- Bonds (including Corporate Bonds and Government Agency Bonds, but Excluding Direct Obligations of the US Government)
- Closed-End Funds and Closed-End ETFs
- ETFs other than broad-based index ETFs
- Convertible Securities
- Initial Public Offerings (IPOs)
- Interests in Oil or Gas Partnerships
- Limited Offerings, Limited Partnership Interests, or Limited Liability Company Interests (including those pertaining to hedge funds or private equity funds)
- Options and Futures
- Preferred Securities
- Rights or Warrants
- Single Stock Futures
- Stocks

### You Must Report (but Not Pre-clear) the Following Transactions:

- Bonds that are Direct Obligations of the Government
- Corporate Actions (splits, tender offers, mergers, stock dividends, etc.)
- Gifts of Securities
- Index Exchange-Traded Funds (ETFs)
- Municipal Bonds
- Stock Purchase Plan Acquisitions
- Shares of Affiliated Funds (Reportable Funds)

### You Do Not Need to Pre-clear or Report the Following Transactions:

- Automatic Investment Plans
- Bankers' Acceptances
- Bank Certificates of Deposit
- Commercial Paper
- High Quality Short-Term Debt Instruments (including repurchase agreements)
- Shares Issued by Money Market Funds
- Shares Issued by Open-End Funds Other Than Reportable Funds
- Shares Issued by Unit Investment Trusts (UITs)

**The preceding may not include all securities types and is subject to change. Please contact the Compliance Officer with any questions.**

# EXHIBIT D – QUARTERLY CERTIFICATION OF ACCOUNTS AND TRANSACTIONS FORM

## XYZA Quarterly Certification of Accounts and Transactions

Reporting Employee: \_\_\_\_\_

For Quarter Ended: \_\_\_\_\_

In accordance with the XYZA Code of Ethics, the following is a list of all accounts and transactions that I disclosed and in which I have a beneficial interest.

### EXISTING ACCOUNTS

Name of Broker/Dealer or Bank	Account Title	Account Number

### NEW ACCOUNTS

Additionally, I have opened the following new accounts during the previous quarter. (If none, indicate anywhere in the table below.)

Name of Broker/Dealer or Bank (include home office city and country)	Account Title	Account Number	Date Account Opened

## TRANSACTIONS

The following is a list of all reportable securities transactions that XYZA has a record of occurring during the previous calendar quarter in any account that you have disclosed and in which you maintain a beneficial interest.

Trans. Date	No. of Shares or Face Amount	Company Name	Type (e.g., equity or fixed income)	Ticker or CUSIP	Principal Amount	Buy or Sell	Interest Rate and Maturity Date	Unit Price	Broker/Dealer or Bank

I certify that this form fully discloses all opened accounts and transactions in which I have a beneficial interest.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Reviewed by: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Exception(s) Noted: \_\_\_\_\_ No \_\_\_\_\_ Yes

If yes, describe:  
\_\_\_\_\_

**EXHIBIT E – PERSONAL TRADING PRE-CLEARANCE FORM  
XYZA**

The pre-clearance form documents that the proposed transaction is not a conflicting transaction. Pre-clearance must be granted prior to placing a trade and is good only for the day of approval.

1. Buy \_\_\_\_\_ Sell \_\_\_\_\_ Short \_\_\_\_\_
2. Security \_\_\_\_\_
3. Common Stock \_\_\_\_\_ Option \_\_\_\_\_ Debt \_\_\_\_\_ Other \_\_\_\_\_
4. If applicable, is the Equity a "New Issue" or "IPO"? Yes \_\_\_\_\_ No \_\_\_\_\_
5. Symbol \_\_\_\_\_
6. Number of Shares/Contracts or Amount of Principal \_\_\_\_\_
7. Brokerage Account Number \_\_\_\_\_ Custodian \_\_\_\_\_
8. Employee has no inside information or other knowledge pertaining to this proposed transaction that constitutes a violation of the Firm's policy or securities laws.
9. The issuer of the security is not on the Restricted List.
10. The issuer of the security is not within the seven-day blackout period (before or after) for client or Fund trades.
11. Any transaction described above establishing a position in a security is undertaken with the intention of holding such position for at least sixty (60) days.

Employee (PRINT NAME)

\_\_\_\_\_

By signing below, the individual verifies that the proposed transaction described above does not violate XYZA's Personal Securities Transaction Policy. Note: One signature is required for pre-clearance.

\_\_\_\_\_  
Compliance Officer

\_\_\_\_\_  
Date