

## B-A Financial Ltd Code of Ethics

B-A Financial Ltd is proud to be designated as Chartered Financial Planners by the CII. As a company and as individuals, we are committed to providing the highest standards of care and professionalism to our clients.

As a result, we have adopted the CII Code of Ethics in its entirety as our own, and all members of staff are required to adhere to it and:

1. Comply with this Code and all relevant laws and regulations.
2. Act with the highest ethical standards and integrity.
3. Act in the best interests of each client.
4. Provide the highest possible standard of service.
5. Treat people fairly regardless of race or racial group; sex or sexual orientation; religion or belief; age; and disability.

### **This includes, but is not limited to:**

- 1.1 dealing with regulators and the CII in an open, clear and co-operative manner;
- 1.2 ensuring that all correspondence and queries from regulators and the CII, and others acting on their behalf, are dealt with promptly, courteously and not in a vexatious or frivolous manner;
- 1.3 working not only within the law but also within the spirit of the law;
- 1.4 making sure our organisation is suitably regulated and has effective compliance arrangements;
- 1.5 ensuring, where required, that we are individually authorised or regulated; and

1.6 reporting any breaches of the Code to the CII. Where this core duty conflicts with another core duty this duty will have priority over the others. By way of example, notwithstanding core duty 3, it is our duty to give confidential information to the relevant authorities where the information relates to a criminal act or fraud by our client.

2.1 being honest, trustworthy and open;

2.2 being reliable, dependable and respectful;

2.3 not taking unfair advantage of a client, a colleague or a third party;

2.4 not bringing the financial services industry or the CII into disrepute whether through our actions in work or outside work;

2.5 not offering or accepting gifts, hospitality or services which could, or might appear to, imply an improper obligation;

2.6 promoting professional standards within the industry;

2.7 encouraging our organisation to produce an ethical code;

2.8 making sure our CII membership or chartered status is described correctly;

2.9 informing the CII of any change in our work or circumstances which affect our membership or chartered status; and

2.10 operating both professionally and in a financially responsible manner so as to avoid becoming insolvent.

**This includes, but is not limited to:**

3.1 encouraging our organisation to put fair treatment of clients at the centre of its corporate culture;

3.2 basing our decisions on a clear understanding of client needs, priorities, concerns and circumstances;

3.3 giving our client all the information, of which we are aware, which is needed for our client to make an informed decision provided that information is not confidential to another client;

3.4 making sure the promises we make to clients about a product's performance and the after sale service are true;

3.5 respecting confidential information of clients, former clients and potential clients;

3.6 ensuring we do not use information from work improperly and/or to our personal or business advantage;

3.7 turning down work where a conflict of interest exists between us and the client; and

3.8 refusing to act where a conflict of interest exists, save where acting in these circumstances is expressly permitted by a regulator.

A conflict of interest is a situation in which someone has competing professional or personal interests. Depending on the circumstances, there may be a perceived rather than an actual conflict of interest. Both perceived and actual conflicts must be dealt with appropriately.

Conflicts of interest can arise where:

We owe, or our firm owes, separate duties to two or more clients in relation to the same or related matters and those duties conflict or there is a significant risk they may conflict; or

Our duty to act in the best interests of any client conflicts, or there is a significant risk it may conflict, with our own interests.

**This includes, but is not limited to:**

4.1 communicating with each client in a way that is accurate and straightforward and expressed in a way that the individual client can understand;

4.2 being transparent about fees and other costs;

4.3 making sure reasonable steps are taken to ensure all advice is accurate and suitable for the individual client;

4.4 obtaining and providing clear information before, during and after the point of sale;

4.5 ensuring adequate and correct records are kept;

4.6 acting with skill, care and diligence;

4.7 acting only within our ability and authorization and seeking help where necessary;

4.8 ensuring our knowledge and expertise is kept up-to-date and relevant for our work including meeting any Continuing Professional Development (CPD) requirements;

4.9 ensuring those who work for us have appropriate training and supervision and contributing to their learning and development; and

4.10 making sure our firm has a clear written complaints procedure which is followed.

**This includes, but is not limited to:**

- 5.1 obeying the equality and diversity laws in our country;
- 5.2 treating each person as an individual;
- 5.3 challenging and reporting unlawful or otherwise unfair discriminatory behavior and practice;
- 5.4 always acting openly and fairly and treating employers, employees, colleagues, clients, potential clients and suppliers with equal respect and opportunity;
- 5.5 making reasonable adjustments to assist people with disabilities or particular needs we may deal with at work;
- 5.6 encouraging our organisation to produce and promote an equality and diversity policy setting out how the business plans to promote equality, diversity and inclusion, prevent discrimination and deal with any instances of discrimination which might happen; and
- 5.7 making sure processes and procedures do not discriminate.



Burns-Anderson is a trading name of B-A Financial Ltd, which is an appointed representative of Burns-Anderson Ltd, which is authorised and regulated by the Financial Services Authority.

B-A Financial Ltd is registered in England and Wales – No. 05450450  
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