

STATEMENT OF PROFESSIONAL STANDING

This is to certify that
Craig Palfrey

(FCA Reference Number: CXP01211)

has fully completed the qualifications requirement,
has maintained competence through continuing professional development
and has agreed to adhere to the FCA APER and the CISI's Code of Conduct



This Statement of Professional Standing
is valid for the period:



01 January 2018 to 31 December 2018

Kevin Moore, Chartered MCSI, Head of Accredited Body,
Chartered Institute for Securities & Investment

Simon Culhane, Chartered FCSI, Chief Executive Officer,
Chartered Institute for Securities & Investment

People must be approved by the FCA before giving financial advice. You can check if this person is approved by the FCA to give advice by going to www.fca.org.uk/register and searching with their FCA individual reference number.

CISI number: 190726

CISI Membership Grade: Chartered MCSI

Date of joining: 24 January 2006

Code of Conduct

Introduction

Professionals within financial services owe important duties to their clients, the market, the profession and society. Where these duties are set out in law or regulation the professional should comply with the requirements in both letter and spirit.

Members of the Chartered Institute for Securities & Investment (CISI) are also required to meet the standards set out within the CISI's eight Principles, which impose an obligation on members to act at all times not only in compliance with the rules, but also to support the underlying values of the Institute.

Each Principle specifies the duties owed by members to one or more stakeholders who may be impacted by their actions (stated overleaf).

There may be situations where professionals are faced with making a decision where the correct course of action is not immediately obvious. In addition to referring to the Code, consideration of the following simple checklist will help to decide the best course of action; is the course of action you are considering honest, open, transparent, and fair?

Honest	Have I been truthful about my action or decision with everyone involved, and told no lies or 'half-truths'?
Open	Is everyone affected by my action or decision aware of the consequences?
Transparent	Have I been clear and not misleading to any party involved in reaching my decision?
Fair	Have I made sure that my action or decision will not result in any party being unknowingly disadvantaged or unduly advantaged?

Members seeking further advice about the Code of Conduct are encouraged to contact the CISI for guidance (email: principles@cisi.org).

Material breach of the Code of Conduct would be incompatible with continuing membership of the CISI and may result in disciplinary action.

The Principles

Stakeholder

- | | |
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| 1. To act honestly and fairly at all times, putting first the interests of clients and customers and to be a good steward of their interests and those of counterparties, taking into account the nature of the business relationship with each of them, the nature of the service to be provided to them and the individual mandates given by them. | Client |
| 2. To act with integrity in fulfilling the responsibilities of your appointment and seek to avoid any acts, omissions or business practices which damage the reputation of your organisation or the financial services profession. | Firm
Profession |
| 3. To observe applicable law, regulations and professional conduct standards when carrying out financial service activities, and to interpret and apply them to the best of your ability according to principles rooted in trust, honesty and integrity. | Regulator |
| 4. To observe the standards of market integrity, good practice, conduct and confidentiality required or expected of participants in markets when engaging in any form of market dealings. | Market participant |
| 5. To be alert to and manage fairly and effectively and to the best of your ability any relevant conflict of interest. | Client |
| 6. To attain and actively manage a level of professional competence appropriate to your responsibilities, to commit to continuing learning to ensure the currency of your knowledge, skills and expertise and to promote the development of others. | Client
Colleagues
Self |
| 7. To decline to act in any matter about which you are not competent unless you have access to such advice and assistance as will enable you to carry out the work in a professional manner. | Client
Self |
| 8. To strive to uphold the highest personal and professional standards at all times. | Profession
Self |

I adhere to the above principles _____