



Code of Ethics

1. Dealing with Regulators (FCA), other government agencies, Compensation Scheme (FSCS), Ombudsmen and PFS

- Any dealings should be in an open, clear and co-operative manner.
- All correspondence is dealt with promptly and not in a vexatious manner.
- Work with these bodies in the spirit of the law, not just the word of law.
- Ensure the company continues to be suitably regulated and has effective compliance arrangements.
- Ensure Certificates of Professional Standing are maintained for Authorised Individuals.
- Report any breaches of the Code of Ethics to the PFS.
- Report any fraudulent activity by clients to the appropriate authorities.

2. Actions

- Be honest, trustworthy and open.
- Be reliable, dependable and respectful.
- Do not take unfair advantage of a client, third party or work colleagues.
- Do not bring the Financial Services industry or the PFS into disrepute in and outside the workplace.
- Do not offer or accept gifts/services/hospitality that could imply an improper obligation.
- Promote professional standards.
- Operate both professionally and in a financially responsible manner to avoid company insolvency.
- Ensure status with PFS is described correctly.
- Inform PFS of any changes that could impact on membership and status.

3. Act in interests of clients at all times

- Fair treatment of customers must be at the centre of our corporate structure.
- Recommendations must only be made when a clear understanding of client circumstances/needs/priorities/concerns is understood and documented.
- Without breaching Data Protection rules provide clients with a full analysis of their position which is sufficient for them to make an informed decision.
- Any “promises” concerning performance and services pre/post sales are true.
- Respect all client data from the inception of the company.
- Do not use information obtained during duties to take a personal or business advantage.
- Where a conflict of interests exists – refuse to act unless the regulator advises otherwise.



4. Provide a high standard of service

- All communications with clients must be accurate and straightforward in a format that is comprehensible to the client taking into account their experiences as an “investor”.
- Be transparent about our fees and charges at the first client contact and subsequently.
- Take all steps to ensure advice is accurate and suitable.
- Obtain and provide clear information before/during/after sale process.
- Ensure correct and more than adequate records are maintained.
- Act with skill, care and diligence.
- Always act within authorisation and ability – seek help when needed.
- Meet CPD and requirements of company T&C.
- Ensure all staff have appropriate training and supervision to add to their development.
- Clear complaints procedures.

5. Treat all people fairly

- Obey UK Equality and Diversity laws.
- Treat people as individuals.
- Challenge and report unfair discrimination.
- Act openly and fairly with employees/employers/colleagues/clients/suppliers. Treat all with equal respect and opportunity.
- Make the necessary adjustments for people with disabilities or special needs.
- Make sure procedures do not discriminate.
- Encourage OSL to promote/produce Equality and Diversity Policy via the business plan – prevent discrimination and deal with any issues arising.