



PRINCIPLES FOR BUSINESS

1. **INTEGRITY**
We will conduct our business with integrity
2. **SKILL, CARE AND DILIGENCE**
We will conduct our business with due skill, care and diligence
3. **MANAGEMENT AND CONTROL**
We will take reasonable care to organise and control our affairs responsibly and effectively, with adequate risk management systems
4. **FINANCIAL PRUDENCE**
We will maintain adequate financial resources
5. **MARKET CONDUCT**
We will observe proper standards of market conduct
6. **CUSTOMERS' INTERESTS**
We will pay due regard to the interests of our customers and treat them fairly
7. **COMMUNICATIONS WITH CLIENTS**
We will pay due regard to the information needs of our clients, and communicate information to them in a way which is clear, fair and not misleading
8. **CONFLICTS OF INTEREST**
We will manage conflicts of interest fairly, both between ourselves and our customers and between customers and other clients
9. **CUSTOMERS: RELATIONSHIPS OF TRUST**
We will take reasonable care to ensure the suitability of our advice and discretionary decisions for any customer who is entitled to rely upon our judgement
10. **CLIENT'S ASSETS**
We will arrange adequate protection for client's assets when we are responsible for them
11. **RELATIONS WITH REGULATORS**
We will deal with our regulators in an open and co-operative way and will disclose to the FSA anything relating to our business which they would reasonably expect to be informed of