



*Atlantic Investors*

*Creative & Independent Financial Advice*

# **Code of ethics and Professional Practice**

## **Introduction**

**As a well established financial services company it has always been our intention, since our inception in 1996, to achieve and maintain the highest levels of professional and ethical standards in all of the financial services advice we provide to clients.**

**This focus on high standards has led us to become one of a small group of firms recognized as Chartered Financial Planners by the pre-eminent professional body within the financial services industry, the Chartered Insurance Institute.**

**As part of our commitment to the provision of comprehensive and comprehensible financial advice we have adopted the Code of Ethics championed by the Chartered Insurance Institute and have incorporated it into our own Code of Ethics and Principles of Professional Practice as indicated below.**

# Atlantic Investors

## Treating Customers Fairly

### Our Company Policy

Atlantic Investors is committed to providing the highest standard of financial advice and investment services. As a Chartered firm we take seriously the requirements of the Financial Conduct Authority, in particular the requirement to treat our customers fairly. We also take our professional responsibilities as Chartered members of the Chartered Insurance Institute extremely seriously and our aim is to provide a competent, timely, courteous service to our customers.

We undertake that all of our actions will be guided by the principle that the interests of our customers are paramount. Our systems and procedures are designed to place our customers at the heart of our business.

In our dealings you can expect that:

- We will be open and transparent in the way we deal with you;
- We will not place our interests before yours;
- We will communicate clearly and without the use of jargon;
- We will inform you of our charges before undertaking any work for you;
- We will deal with any problems you may have promptly and fairly.

As examples of how the principles and guidelines mentioned above work in practice in our business we set out below details of what you can expect from us in various areas of our business.

### When we give advice

- We will only recommend suitable investments and other products after finding out sufficient information about your circumstances to be able to advise properly. Our advice will be guided only by what is best for our customers.
- We will set out in writing in clear concise terms why we have recommended any particular investment or product.
- We will inform you in advance of our charges and how these could be paid. If any commission is paid because you invest in any product or investment then we will tell you how much this is.

- In the event there is a conflict of interest between us and you, we will tell you about this as soon as we can after becoming aware of this.
- We will keep comprehensive records of our dealings with you and will record your attitude to risk.
- Where appropriate, and where agreed between us, we will monitor your investments and other financial products and contact you to let you know how they are doing.

### **In our dealings with you**

- When you contact us you can expect that we will be polite and courteous.
- All of our staff are trained in dealing with our customers and in treating them fairly.
- When we write to you we will be clear and straightforward; we will try not to use jargon or technical terms. We will be happy to discuss or clarify any matter.
- We will remunerate and incentivise our staff in ways which encourage them to deal with our customers fairly and impartially and to continually find ways to improve our service.
- You can expect that all our staff are trained properly for their roles. All of our advisory staff are qualified financial advisers and are fully trained in respect of the investments and products on which they advise.

### **When things go wrong**

- If you complain about any aspect of our service then you can expect that your complaint will be dealt with professionally, impartially and in accordance with the rules laid down by our regulator, the Financial Conduct Authority.
- We will provide details of our complaints policies and procedures.

We hope you find using our services a pleasant and straightforward experience. We always welcome comments and observations about the way we deal with our customers and would encourage you to contact us if you have any comments on the way we deal with you.

## **Our commitments in relation to the adoption of the Chartered Insurance Institute Code of Ethics are as follows:**

### **1. We will comply with this Code and all relevant laws and regulations.**

#### **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 organization is suitably regulated and has effective compliance arrangements;

1.5 ensuring, where required, we are individually authorized 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 your client.

### **2. We must act with the highest ethical standards and integrity.**

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

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 your 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 your organisation to produce an ethical code;
- 2.8 making sure your CII membership or chartered status is described correctly;
- 2.9 informing the CII of any change in your work or circumstances which affect your membership or chartered status; and
- 2.10 operating both professionally and in a financially responsible manner so as to avoid becoming insolvent.

### **3. We must act in the best interests of each client.**

#### **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 your 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 or employer 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.

#### **4. We must provide a high standard of service.**

##### **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 authorisation and seeking help where necessary;
- 4.8 ensuring your knowledge and expertise is kept up-to-date and relevant for your work including meeting any Continuing Professional Development (CPD) requirements;
- 4.9 ensuring those who work for you have appropriate training and supervision and contributing to their learning and development; and
- 4.10 if it is within your control, making sure your firm has a clear written complaints procedure which is followed.

#### **5. We must 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:**

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 behaviour 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 if it is within your control, making sure processes and procedures do not discriminate.