

The attached grids benchmark the ethical codes of:

- the national member societies of European Federation of Financial Analysts Societies (EFFAS); and
- the Association for Investment Management and Research (AIMR).

EFFAS Benchmarking Grid

In 2002, the European Federation of Financial Analysts Societies (EFFAS) set up a Professional Conduct Codes Taskforce (PCCT) to define a benchmarking procedure for the national member societies' codes, in order to complement action at EU level. EFFAS' national member societies see this benchmarking as a first step leading to a mandate to define specific application rules and eventually "accredit" national Codes of Ethics.

The EFFAS Benchmarking Grid is divided in 16 sections, each corresponding to 16 different issues normally addressed in the national Codes of Ethics.

1. Definition of a Financial Analyst
2. Professional qualification of a Financial Analyst
3. General professional duties
4. Language of research reports
5. Valuation, recommendations and target prices
6. Distribution of research
7. Relations with customers
8. Relations with analysed companies
9. Relations with investment banking departments
10. Disclosure of conflicts of interest
11. Analysts' remuneration
12. Stock ownership
13. Relations with Media
14. Relations with colleagues
15. Relations with Supervisory authorities
16. Sanctions

National Societies can examine their own Code in a critical manner and, at the same time, compare their position relative to the other national Codes of Ethics. The differences that exist between the various Codes of Conducts make it unlikely that a single EFFAS Code of Conduct will be realised in the short term. Such differences may derive from national legislations, local market practices and regulations and different national sensitivities towards specific ethical issues.

Benchmarking represents, in EFFAS' opinion, a gradual approach to dealing with the problem. It should allow each association to better understand the strengths and weaknesses of its own Code, through direct comparison with the other codes, and allows each association to initiate a process of upgrading towards "market best practice".

The Codes of Ethics and Standards of Professional Conduct of the EFFAS Member Societies are based on the principles of the International Council of Investment Analysts (ICIA), a global organisation that includes all analyst societies, and which was set up to formulate fundamental principles and values for achieving high standards of integrity and professional excellence for its members.

The members of the EFFAS Societies are not limited to financial analysts but include the whole range of investment professionals and capital markets experts. Every individual member, regardless of whether they hold a CEFA or CIIA designation or not, must abide by the Codes and Standards of Ethics and of Professional Conduct. They should be seen as additional to the requirements of existing Community legislation.

For practical guidance and interpretation of the principles expressed in the Codes of Conduct, Member Societies publish, on an ongoing basis, practice handbooks that assist members in acting according to the responsibilities to which they have committed themselves in acknowledging the respective Code of Conduct.

Possible sanctions differ from Society to Society, but in all cases they comply with, and are subject to, local legislation. There are EFFAS societies in the following countries: Austria, Belgium, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Luxembourg, the Netherlands, Norway, Poland, Portugal, Spain, Sweden, Switzerland, Russia and Ukraine.

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1. Definition of a Financial Analyst

The Code of Ethics has an explicit definition of financial analyst	Yes	Yes	Yes	Yes	No		No	Yes	Yes	Yes	Yes	Yes	Yes	
The exercise of the profession is subject to formal/legal registration	No	No	Yes	No	Yes		No	No	Yes	Yes	No	No	No	

The definition includes:

a	- those producing research reports only (eg. investment analysts)	Yes	Yes	Yes	Yes			Yes	Yes	Yes	Yes	Yes	Yes	Yes	
b	- the above plus portfolio managers	Yes	Yes	Yes				Yes	Yes	Yes	Yes		Yes	Yes	
c	- the above plus investment advisers (eg. financial planners)	Yes	Yes		Yes				Yes	Yes	Yes	Yes	Yes	Yes	
d	- the above plus brokers and intermediaries	Yes							Yes	Yes	Yes		Yes	Yes	
e	- any natural person whose activity can influence investment decisions in financial markets (e.g. finance managers, accountants, etc)				Yes		Yes		Yes		Yes		Yes	Yes	Yes

2. Professional qualification of a Financial Analyst

a	Have a university degree													No	
b	Pass professional certification accepted at the national level	Yes	Yes	Yes	Yes	Yes			Yes	Yes		Yes		No	No
c	Pass professional certification accepted at the international level				Yes					Yes				No	No
d	Have enough experience in the specific professional area	Yes	Yes	Yes	Yes	Yes		Yes			Yes	Yes	Yes	Yes	Yes
e	Take an active role in professional community activities and exchange experience with colleagues		Yes		Yes	Yes									Yes
f	Be member of national professional association and follow national and international codes of professional conduct	Yes	Yes	Yes	Yes	No	Yes	Yes			Yes	Yes	Yes	Yes	Yes
g	Improve and maintain professional skills constantly	Yes	Yes	Yes	Yes	Yes		Yes			Yes	Yes	Yes		Yes

3. General professional duties

a	Perform your tasks objectively and independently	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b	Perform your duties with diligence and thoroughness	Yes	Yes	Yes	Regl	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c	Accept a task only in accordance to qualification and experience	Yes	Yes	Yes	Yes				Yes				Yes		Yes
d	Employ state-of-the-art procedures, resources and efforts needed for proper results			Yes	Regl		Yes	Yes	Yes	Yes		Yes	Yes		
e	Use maximum of skills and knowledge				Yes		Yes	Yes		Yes			Yes	Yes	Yes
f	Open information for public only in agreement with customers	Yes	Yes		Regl	Yes				No	Yes			Yes	Yes
g	Act only in accordance with international and national law	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
h	Use reliable and multiple information sources to perform your tasks			Yes	Regl		Yes	Yes	Yes	Yes		Yes	Yes		Yes
i	Do not publish research results under your own name that do not comply with your personal opinions	Yes		Yes	Regl		Yes		Yes			Yes			Yes

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4. Language of research reports

a	Be clear and understandable for the client			Yes	Yes	Yes	Yes	Yes	Yes		Yes	Yes	Yes		Yes
b	Avoid misinterpretation of the same statement or conclusion			Yes	Yes		Yes		Yes	Yes	Yes	Yes	Yes		Yes
c	Avoid guarantees of investment performance and promissory statements	Yes	Yes		Yes		Yes	Yes	Yes		Yes	Yes	Yes	Yes	Yes
d	Avoid inflammatory points				Yes						Yes		Yes		
e	Statements and conclusions have to be supported by reasonable facts and inputs	Yes		Yes	Regl	Yes	Yes			Yes	Yes	Yes	Yes	Yes	Yes
f	References to external sources of information are to be present			Yes	Yes	Yes	Yes	Yes	Yes	Yes		Yes	Yes		Yes
g	No advertising elements to be present				Yes		Yes						Yes		

5. Valuation, recommendations and target prices

a	Distinguish between facts and opinions/suggestions, hard figures and estimates	Yes	Yes	Yes	Regl	Yes	Yes		Yes	Yes	Yes	Yes	Yes		Yes
b	Publish valuation methods utilised				Yes		Yes					Yes			Yes

If Multiples are used:

c	- list peer group				Yes		Yes								
d	- explain definition(s) of earnings				Yes		Yes								
e	- explain multiples used				Yes		Yes								

If DCF is used:

f	- publish complete time series of earnings				Yes										
g	- publish definitions and calculations of Cash Flow, Cost of Capital and Terminal Value				Yes		Yes								
h	Indicate when deviating from generally accepted principals, explain how and why				Yes		Yes								
i	Recommendations have to be clear and easily understandable by targeted customers			Yes	Regl			Yes	Yes		Yes	Yes	Yes		Yes
j	Definition of each rating must be consistent with its plain meaning						Yes								
k	Recommendations have to be consistent with argument of the analysis	Yes		Yes	Regl		Yes			Yes		Yes			Yes
l	Disclose material facts/risks that are adverse to your recommendation				Yes			Yes		Yes		Yes	Yes		Yes
m	Be consistent when making judgement and value statements, irrespective of if audience is external, internal or private	Yes		Yes			Yes						Yes		
n	Maintain appropriate records	Yes			Regl		Yes		Yes	Yes				Yes	

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6. Distribution of research

a	Use reasonable judgement when disseminating information				Regl		Yes			Yes		Yes	Yes		
b	Do not release research to third parties before releasing them to clients	Yes		Yes		Yes	Yes					Yes			Yes
c	Avoid selective distribution to specific customers	Yes		Yes			Yes			Yes	Yes	Yes	Yes		Yes
d	Do not manipulate prices of securities through selective distribution			Yes	Regl		Yes			Yes	Yes		Yes		Yes
e	Take special care when information is disseminated through channels open for the general public		Yes	Yes	Yes		Yes			Yes	Yes		Yes		Yes

When shortened versions of an analysis/report are released:

f	- indicate incompleteness (pointing to the original source)		Yes		Yes		Yes						Yes		
g	- disclose potential conflicts of interest				Regl					Yes			Yes	Yes	
h	- make sure that valuations and recommendations are identical to those of the complete version				Yes		Yes								Yes
i	Do not release information that does not comply with legal requirements and your Code of Ethics	Yes	Yes	Yes	Yes	Yes	Yes	Yes				Yes	Yes	Yes	Yes

7. Relations with customers

a	Clients' interest always to come first	Yes	Yes	Yes	Regl	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b	Deal fairly when offering financial services to actual/potential customer				Regl		Yes	Yes		Yes	Yes		Yes		Yes
c	When visiting a client announce purpose of the visit in advance				Yes		Yes	Yes							
d	Know his needs, financial situation and the degree of professionalism			Yes	Regl		Yes	Yes		Yes	Yes	Yes	Yes		Yes
e	Indicate clearly the features of an investment to prospective clients			Yes	Regl			Yes		Yes		Yes	Yes		Yes
f	Consider appropriateness of recommendations with regard to the clients' investment objectives and portfolio				Regl	Yes	Yes	Yes	Yes	Yes		Yes	Yes		
g	When advising customers, always be forthright and honest.	Yes	Yes	Yes	Regl	Yes	Yes		Yes	Yes	Yes	Yes	Yes	Yes	Yes
h	Secure suitability of advice for client				Regl			Yes	Yes	Yes		Yes			
i	Offer informed advice				Regl		Yes			Yes	Yes				
j	Do not serve two or more competing clients on sensitive issues without their knowledge	Yes	Yes		Yes		Yes				Yes	No	Yes	Yes	
k	Do not claim to provide independent advice if untrue	Yes					Yes						Yes	Yes	
l	Give clients adequate opportunity to act on recommendation before acting on own/employer behalf (priority rules)	Yes	Yes	Yes	Regl		Yes			Yes	Yes	Yes			Yes
m	Provide written detailed agreement with client				Regl										No
n	Keep confidentiality on information obtained from clients		Yes		Yes	Yes	Yes	Yes	Yes	Yes	Yes		Yes	Yes	Yes

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8. Relations with analysed companies

a	Know the company: their business, performance, financials, their ethics and agenda in communicating with analysts						Yes								Yes
b	Agree scope of research assignment with analysed companies in advance, possibly in writing	Yes	Yes				Yes								No
c	Disclose all potential conflicts of interest in relation to other companies analysed by the same analysts, investment-banking assignments, etc.				Regl			Yes	Yes	Yes	Yes		Yes	Yes	No
d	Avoid, if possible, entering into assignments if conflict exists; if conflict arises during assignment, then refer to your supervisors	Yes	Yes	Yes	Yes	Yes		Yes	Yes	Yes	Yes			Yes	Yes
e	Do not accept any gift, entertainment, other, which could influence your objective judgement			Yes	Yes		Yes	Yes		Yes		Yes		Yes	Yes
f	Do not submit draft of research reports before publication						Yes								
g	Only submit draft without recommendations			Yes	Yes							Yes			
h	Keep written/recorded documentation of key communication, including time stamping						Yes		Yes				Yes	Yes	

9. Relations with investment banking departments

a	Do not allow investment-banking relationship/business with their clients to influence analysts' recommendation, to be performed objectively.	Yes		Yes	Regl		Yes	Yes				Yes		Regl	
b	Research analysts should not report to investment-banking departments			Yes	Yes										Yes
c	Ensure that your company's have a written policy in place on how to take an analyst over the "Chinese Wall", when assigned to an investment banking deal, and stick to it (*)			Yes	Regl		Yes					No		Regl	
d	When in doubt if an action is ethical or not the analyst should contact his/her superior or the Compliance Officer			Yes	Yes		Yes		Yes					Regl	
e	No communication with analysts in relation to the Corp Finance assignment should take place before cleared by the Compliance Officer (**)			Yes	Regl		Yes							Regl	
f	All communication with Investment Banking Department to be kept confidential vis-à-vis third parties, either external or internal			Yes	Yes		Yes							Regl	
g	Keep a written record of any relevant communication between Investment Banking Department and analyst.													Regl	

(*) This policy should ensure that there is no conflict of interest in the way the analyst covers the company whilst the firm and analyst is being assigned to a corporate finance deal.

(**) An independent party such as the compliance officer should be the key link in lifting the analyst over the "Chinese Wall" and should keep a written, time-logged documentation of all such events

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10. Disclosure of conflicts of interest

a	Take reasonable steps to avoid conflicts of interests.	Yes	Yes	Yes	Regl	Yes	Yes	Yes		Yes	Yes	Yes	Yes	Yes	Yes
b	If in any doubt regarding possible conflicts of interests, inform supervisors			Yes	Yes		Yes		Yes		Yes				
c	Disclose clients in advance all matters reasonably expected to impair your advice	Yes	Yes	Yes	Regl		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
d	If conflicts of interests arise during a task, ensure fair treatment/information to clients by disclosure			Yes	Yes		Yes	Yes	Yes	Yes	Yes	Yes			Yes
e	Do not perform transactions or tasks for clients, if you have material interest in the transaction	Yes	Yes									Yes	Yes	Yes	Yes
f	Pursue implementation into your company of procedures to prevent/resolve conflicts of interests			Yes	Yes										
g	Inform superiors of any form of pressure in the course of professional duties			Yes	Yes		Yes							Yes	
h	Written disclosure in research reports have to be done prominently (front page, or a clear indication given on the front page in bold)						Yes								

11. Analysts' remuneration

a	Do not accept any formula-based or other links between the analysts' compensation and results of the investment-banking department			Yes	Yes						Yes	Yes			No
b	Remuneration to be based mainly on analyst's recommendation performances				Yes		Yes								No
c	Do not accept any pre-IPO stocks in companies analysed			Yes			Yes				Yes				Yes
d	Do not accept any payment or any other benefits from the analysed company that could impair judgement/advice			Yes	Yes		Yes		Yes		Yes	Yes			Yes
e	Charge reasonable fees, not contingent on results		Yes				Yes					No			Yes
f	Refrain from "soft" commissions				Yes		Yes		Yes						
g	Disclose monetary compensation or other benefits related to a specific task, when required by circumstances				Yes		Yes		Yes			Yes			

12. Stock ownership

a	Stock ownership allowed, subject to full disclosure to customers		Yes								Yes	Yes	Yes		
b	No ownership allowed in shares, covered by analyst's research			Yes	Yes		Yes								
c	Refrain from dealing in shares in all company to be researched				Yes		Yes						Yes		
d	Never act against your recommendation, except for clear personal necessity		Yes				Yes		Yes		Yes				
e	Abstain from trading in determined periods, before and after publication of research on a stock owned by analyst						Yes				Yes				
f	When dealing for own account, always subordinate to clients' interest	Yes			Regl		Yes	Yes		Yes	Yes	Yes	Yes		Yes

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13. Relations with Media

a	Follow in first instance your company's written media policy			Yes			Yes								
b	Act in a way which would enhance the credibility of the analyst profession and of your firm in the marketplace			Yes	Yes		Yes			Yes	Yes		Yes		Yes
c	Do not disclose through media channels any research reports, or part of them, or information which could influence the price of a stock, unless already made public	Yes	Yes	Yes	Regl		Yes			Yes	Yes				Yes
d	Only express opinions about stocks covered by the analyst						Yes						Yes		
e	Never express opinions about a security in conflict with what was written in recent research reports on that specific security						Yes								
f	Never disclose or even hint at any confidential information; in doubt say nothing	Yes			Yes		Yes	Yes		Yes	Yes		Yes		Yes

14. Relations with colleagues

a	Behave correctly with your colleagues	Yes	Yes		Yes		Yes			Yes	Yes	Yes	Yes		Yes
b	Offer help/ advice to colleagues in case connected with profession, unless this could hurt clients' or employers' interests	Yes			Yes		Yes			Yes					Yes
c	Promote professional qualification of your colleagues		Yes		Yes		Yes								Yes
d	Do not play unfair competition with colleagues, avoiding any public discredit to them	Yes	Yes	Yes	Yes		Yes			Yes	Yes		Yes		Yes
e	In particular, do not discredit nor disparage investment recommendations issued by competitors in front of third parties		Yes		Yes		Yes			Yes	Yes				
f	Address critics personally to your colleagues or, in determined circumstances, through the Association.	Yes	Yes		Yes		Yes			Yes	Yes				
g	Inform colleagues about the Code of Conduct to which the analyst is subject		Yes	Yes	Yes	Yes	Yes						Yes		Yes
h	Make your best efforts so that your colleagues respect the same principles		Yes	Yes	Yes		Yes			Yes			Yes		
i	Do not participate nor assist a business conduct from a fellow member that is, or could be, in violation of standard rules of conduct.		Yes	Yes	Yes		Yes			Yes		Yes			Yes
j	Denounce such violations from other members of the professions to the National association	Yes					Yes						Yes		
k	Settle controversies with colleagues about the Code of Conducts through the Association	Yes	Yes		Yes		Yes				Yes		Yes		
l	Leader and leaders responsibility/ The financial analyst is obliged to act on the Society's Code of Ethics/ A leader (manager) is obliged to look after that his staff will act on the Society's Code of Ethics														

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15. Relations with Supervisory authorities

a	Always offer full cooperation if required to co-operate with Supervisory Authorities as an expert in any procedure, both individually and by means of the National Associations	Yes	Yes	Yes			Yes				Yes	No			Yes	
b	Provide detailed information about the operating professional context			Yes	Yes		Yes									
c	Provide collaboration in the making of regulatory rules		Yes				Yes				Yes					
d	Be transparent vs. the Authority when a procedure is in the making, abstaining from any ambiguous behaviour	Yes					Yes									
e	Comply with self-regulatory rules, in addition to general ones	Yes	Yes	Yes	Yes	Yes	Yes			Yes	Yes	Yes	Yes	Yes		
f	Communicate relevant infringements detected in professional activity						Yes						Yes			
g	Collaborating with the authorities to amend infringements						Yes									

16. Sanctions**The National Code of Ethics has an explicit system of sanctions**

No Yes No No Yes Yes Yes Yes Yes Oblgt

Infringements

a	Charge infringements only to natural persons	Yes	Yes		Yes	Yes	No		Yes	Yes		Yes	Yes			
b	If infringement is carried out by legal entities, charge those members who adopted decisions								Yes				Yes			
c	Consider only infringements undertaken during professional duties				Yes		Yes					Yes				
d	Do not consider those due to errors or accidental lack of knowledge															

Determine the degree of the infringement with regard to:

e	- the damage made to investor						Yes						Yes			
f	- the damage to proper market functioning						Yes						Yes			
g	- the level of investor's capability						Yes									
h	- the number of investors damaged						Yes						Yes			
i	- the accessibility to markets															
j	- the repetition of infringements						Yes						Yes			
k	- the consciousness deliberated and organised punishable acts undertaken						Yes									
l	- the benefit obtained by the violator						Yes									

Sanctions*Determine the degree of sanction as follows:*

m	- private warning	Yes		Yes	Yes	Yes	Yes		Yes	Yes	Yes	Yes	Yes	Yes	Yes	
n	- public warning	Yes					Yes		Yes	Yes		Yes	Yes			
o	- temporary suspension from the Association	Yes	Yes	Yes	Yes	Yes	Yes		Yes		Yes	Yes	Yes			
p	- definitive lending-off from The Association	Yes	Yes	Yes	Yes		Yes		Yes	Yes	Yes	Yes	Yes	Yes		
q	Allow for rehabilitation, accomplishing certain requirements, such as the pay-back of the unduly obtained benefits and compensation of injured party						Yes						Yes			

Regl – regulated by law

Oblgt – obligatory

ITALY – As of July 2003, the Italian Parliament was approving a law regulating the profession of financial analyst.

AIMR Code of Ethics and Standards of Professional Conduct applied to the EFFAS Benchmarking Grid

The Association for Investment Management and Research (AIMR) Code of Ethics and Standards of Professional Conduct are a fundamental element of AIMR's values and an essential tool in achieving its mission of setting high standards of education, integrity, and professional excellence. They are closely linked to the principles of the International Council of Investment Analysts (ICIA), a global organisation that includes all analyst societies.

All AIMR members, who comprise the full range of investment professionals (including every holder of the Chartered Financial Analyst® (CFA®) designation), and all CFA candidates, must abide by the Code and Standards. Within Europe, the Code and Standards apply to AIMR's affiliated societies in Austria, Bulgaria, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Luxembourg, the Netherlands, Romania, Ireland, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

While the Code and Standards provide AIMR members with the basic tenets that they must follow to practice in an ethical and professional manner, in addition to compliance with relevant laws and regulation, AIMR publishes the *Standards of Practice Handbook* (SOPH) that provides authoritative guidance, interpretation, recommended procedures for compliance and application examples to assist members in understanding their responsibilities under the Code and Standards.

In applying the Code and Standards to the EFFAS Benchmarking Grid (below), the relevant provision of the Code and Standards that covers each category is cited. When a provision is listed, the Code and Standards address the category although more specific guidance can be found in the SOPH. Categories that are not covered by the EFFAS Benchmarking Grid but which are addressed by the Code and Standards appear in italics.

1. Definition of a Financial Analyst

AIMR's Code and Standards are not limited in scope to the professional activities of financial analysts. Rather, AIMR has written the Code and Standards to be applicable to the broader audience of investment professionals in general. All AIMR members, including CFA Charterholders, as well as candidates in the CFA program, regardless of their professional activities, must abide by the Code and Standards. As a result, the Code and Standards reaches a variety of specialties in the investment profession including, financial analysts, portfolio managers, brokers, bankers, and financial advisers.

2. Professional qualification of a Financial Analyst

AIMR's Code and Standards does not prescribe particular qualifications for an individual to become a financial analyst but AIMR's membership rules prescribe a certain level of investment experience and formal education. AIMR members who hold the CFA designation must pass a series of three rigorous examinations as well as meet certain work experience qualifications to earn their Charter.

3. General professional duties

a	Perform your tasks objectively and independently	IV(A.3)
b	Perform your duties with diligence and thoroughness	IV(A.1)
c	Accept a task only in accordance with qualification and experience	Code of Ethics
d	Employ state-of-the-art procedures, resources and efforts needed for proper results	Code of Ethics
e	Use maximum of skills and knowledge	Code of Ethics
f	Open information for public only in agreement with customers	IV(B.5)
g	Act only in accordance with international and national law	I(A)
h	Use reliable and multiple information sources to perform your tasks	IV(A.1.b)
i	Do not publish research results under your own name that do not comply with your personal opinions	IV(A.1), IV(A.2)
	<i>Do not engage in any professional conduct involving dishonesty, fraud, deceit, or misrepresentation</i>	II(B.1)
	<i>Do not commit any act that reflects adversely on their honesty, trustworthiness, or professional competence</i>	II(B.1)

4. Language of research reports

a	Be clear and understandable for the client	
b	Avoid misinterpretation of the same statement or condition	IV(A.1.c)
c	Avoid guarantees of investment performance and promissory statements	IV(B.6)
d	Avoid inflammatory points	
e	Statements and conclusions have to be supported by reasonable facts and inputs	IV(A.1.b)
f	References to external sources of information are to be present	II(C)
g	No advertising elements to be present	

5. Valuation, recommendations and target prices

a	Distinguish between facts and opinions/suggestions, hard figures, and estimates	IV(A.2), IV(B.2.c)
b	Publish valuation methods utilized	IV(B.2.d)

If Multiples are used:

c	- list peer group	IV(B.2.d)
d	- explain definition(s) of earnings	IV(B.2.d)
e	- explain multiples used	IV(B.2.d)

If DCF is used:

f	- publish complete time series of earnings	IV(B.2.d)
g	- publish definitions and calculations of Cash Flow, Cost of Capital and Terminal Value	IV(B.2.d)
h	Indicate when deviating from generally accepted principles, explain how and why	IV(B.2.d)
i	Recommendations have to be clear and easily understandable by targeted customers	IV(B.2.d)
j	Definition of each rating must be consistent with its plain meaning	
k	Recommendations have to be consistent with argument of the analysis	IV(A.1)
l	Disclose material facts/risks that are adverse to your recommendation	IV(A.2.a), IV(B.2.d)
m	Be consistent when making judgment and value statements, irrespective of whether audience is external, internal, or private	IV(A.1), IV(B.3)
n	Maintain appropriate records	IV(A.1.d)

6. Distribution of research

a	Use reasonable judgment when disseminating information	IV(B.3), IV(A.3)
b	Do not release research to third parties before releasing them to clients	IV(B.3)
c	Avoid selective distribution to specific customers	IV(B.3)
d	Do not manipulate prices of securities through selective distribution	IV(B.3)
e	Take special care when information is disseminated through channels open for the general public	IV(B.3), IV(A.3)

When shortened versions of an analysis/report are released:

f	- indicate incompleteness (pointing to the original source)	
g	- disclose potential conflicts of interest	IV(B.7)
h	- make sure that valuations and recommendations are identical to those of the complete version	IV(B.3)
i	Do not release information that does not comply with legal requirements and your Code of Ethics	I(A)

7. Relations with customers

a	Clients' interest always to come first	IV(B.1)
b	Deal fairly when offering financial services to actual/potential customer	IV(B.3)
c	When visiting a client announce purpose of the visit in advance	
d	Know his needs, financial situation and the degree of professionalism	IV(B.2)
e	Indicate clearly the features of an investment to prospective clients	IV(B.2.d)
f	Consider appropriateness of recommendations with regard to the clients' investment objectives and portfolio	IV(B.2.b)
g	When advising customers, always be forthright and honest	II(B.1)
h	Secure suitability of advice for client	IV(B.2)
i	Offer informed advice	IV(A.1.b)
j	Do not serve two or more competing clients on sensitive issues without their knowledge	IV(B.3)
k	Do not claim to provide independent advice if untrue	IV(B.6)
l	Give clients adequate opportunity to act on recommendation before acting on own/employer behalf (priority rules)	IV(B.4)
m	Provide written detailed agreement with client	
n	Keep confidentiality on information obtained from clients	IV(B.5)
	<i>Update clients financial information and investment objectives as necessary but no less frequently than annually</i>	IV(B.2.a)
	<i>Make no recommendation unless it is suitable to the client's financial situation, investment experience, and investment objectives</i>	IV(B.2.b)
	<i>Disclose to clients the basic format and general principles of the investment processes by which securities are selected and portfolios are constructed</i>	IV(B.2.d)

8. Relations with analysed companies

a	Know the company: their business, performance, financials, their ethics and agenda in communicating with analysts	IV(A.1)
b	Agree scope of research assignment with analyzed companies in advance, possibly in writing	
c	Disclose all potential conflicts of interest in relation to other companies analysed by the same analysts, investment-banking assignments, etc.	IV(B.7)
d	Avoid, if possible, entering into assignments if conflict exists; if conflict arises during assignment, then refer to your supervisors	IV(A.3)
e	Do not accept any gift, entertainment, other, which could influence your objective judgment	IV(A.3)
f	Do not submit draft of research reports before publication	IV(A.3)
g	Only submit draft without recommendations	IV(A.3)
h	Keep written/recorded documentation of key communication, including time stamping	IV(A.1)

9. Relations with investment banking departments

a	Do not allow investment-banking relationship/business with their clients to influence analysts' recommendation, to be performed objectively	IV(A.3)
b	Research analysts should not report to investment-banking departments	IV(A.3)
c	Ensure that your companies have a written policy in place on how to take an analyst over the "Chinese Wall," when assigned to an investment-banking deal, and stick to it	IV(A.3)
d	When in doubt if an action is ethical or not the analyst should contact his/her supervisor or the Compliance Officer	I(A)
e	No communication with analysts in relation to the Corp Finance assignment should take place before cleared by the Compliance Officer	IV(A.3)
f	All communication with Investment Banking Department to be kept confidential vis-à-vis third parties, either external or internal	IV(A.3)
g	Keep a written record of any relevant communication between Investment Banking Department and analyst	IV(A.3)

10. Disclosure of conflicts of interest

a	Take reasonable steps to avoid conflicts of interest	IV(A.3)
b	If in any doubt regarding possible conflicts of interests, inform supervisors	III(C)
c	Disclose clients in advance all matters reasonably expected to impair your advice	IV(B.7)
d	If conflicts of interests arise during a task, ensure fair treatment/information to clients by disclosure	IV(B.7)
e	Do not perform transactions or tasks for clients, if you have material interest in the transaction	IV(B.1)
f	Pursue implementation into your company of procedures to prevent/resolve conflicts of interests	
g	Inform supervisors of any form of pressure in the course of professional duties	
h	Written disclosure in research reports have to be done prominently (front page, or a clear indication given on the front page in bold)	
	<i>Disclose any consideration or benefit received or delivered to others for the recommendation of any services to the client</i>	IV(B.8)
	<i>Do not undertake any independent practice that could result in compensation or other benefit in competition with their employer unless consent from all parties is obtained</i>	III(B)
	<i>Disclose all monetary compensation or other benefits received for services in addition to compensation conferred by an employer</i>	III(D)
	<i>Comply with any prohibitions on activities imposed by their employer if a conflict of interest exists</i>	III(C.2)

11. Analysts' remuneration

a	Do not accept any formula-based or other links between the analysts' compensation and results of the investment-banking department	IV(A.3)
b	Remuneration to be based mainly on analyst's recommendation performances	
c	Do not accept any pre-IPO stocks in companies analysed	IV(A.3), IV(B.4)
d	Do not accept any payment or any other benefits from the analysed company that could impair judgment/advice	IV(A.3)
e	Charge reasonable fees, not contingent on results	
f	Refrain from "soft" commissions	
g	Disclose monetary compensation or other benefits related to a specific task, when required by circumstances	IV(B.7), IV(B.8)

12. Stock ownership

a	Stock ownership allowed, subject to full disclosure to customers	IV(B.4), IV(B.7)
b	No ownership allowed in shares, covered by analyst's research	
c	Refrain from dealing in shares in all companies to be researched	
d	Never act against your recommendation, except for clear personal necessity	
e	Abstain from trading in determined periods, before and after publication of research on a stock owned by analyst	IV(B.4), IV(B.7)
f	When dealing for own account, always subordinate to clients' interest	IV(B.4)
	<i>Beneficial ownership includes having a direct or pecuniary interest in the investment, the power to direct voting of the shares, or the power to dispose of the investment</i>	IV(B.4)

13. Relations with Media

a	Follow in first instance your company's written media policy	
b	Act in a way which would enhance the credibility of the analyst profession and of your firm in the marketplace	Code of Ethics
c	Do not disclose through media channels any research reports, or part of them, or information which could influence the price of stock, unless already made public	V(A)
d	Only express opinions about stocks covered by the analyst	
e	Never express opinions about a security in conflict with what was written in recent research reports on the specific security	
f	Never disclose or even hint at any confidential information; if in doubt say nothing	IV(B.5)

14. Relations with colleagues

a	Behave correctly with your colleagues	Code of Ethics
b	Offer help/advice to colleagues in case connected with profession, unless this could hurt clients' or employers' interests	Code of Ethics
c	Promote professional qualification of your colleagues	Code of Ethics
d	Do not play unfair competition with colleagues, avoiding any public discredit to them	Code of Ethics
e	In particular, do not discredit nor disparage investment recommendations issued by competitors in front of third parties	Code of Ethics
f	Address critics personally to your colleagues or, in determined circumstances, through the Association	Code of Ethics
g	Inform colleagues about the Code of Conduct to which the analyst is subject	III (A)
h	Make your best efforts so that your colleagues respect the same principles	III (A), Code of Ethics
i	Do not participate in nor assist a business conduct from a fellow member that is, or could be, in violation of standards rules of conduct	I(B)
j	Denounce such violations from other members of the professions to the Association	
k	Settle controversies with colleagues about the Code of Conducts through the Association	
l	Leader and leaders responsibility/The financial analyst is obliged to act on the Society's Code of Ethics/A leader (manager) is obliged to ensure that his staff will act on the Society's Code of Ethics	III(E)

15. Relations with Supervisory authorities

a	Always offer full cooperation if required to co-operate with Supervisory Authorities as an expert in any procedure, both individually and by means of the National association	I(A)
b	Provide detailed information about the operating professional conduct	
c	Provide collaboration in the making of regulatory rules	
d	Be transparent vs. the Authority when a procedure is in the making, abstaining from any ambiguous behavior	
e	Comply with self-regulatory rules, in addition to general ones	I(A)
f	Communicate relevant infringements detected in professional activity	PCP Rules of Procedure
g	Collaborating with the authorities to amend infringements	

Use of Credentials, Qualifications

	<i>Do not misrepresent services you or your firm as capable of performing</i>	<i>IV(B.6)</i>
	<i>Do not misrepresent your qualifications or the qualifications of your firm</i>	<i>IV(B.6)</i>
	<i>Do not misrepresent academic credentials</i>	<i>IV(B.6)</i>
	<i>Reference AIMR membership, the CFA designation, and participation in the CFA program in a dignified and judicious manner</i>	<i>II(A)</i>

Use of Material Non-public Information

	<i>Do not trade or cause others to trade on material non-public information in breach of a duty if the information was misappropriated or relates to a tender offer</i>	<i>V(A)</i>
	<i>Make reasonable efforts to achieve public dissemination of material nonpublic information disclosed in breach of a duty</i>	<i>V(A)</i>

Performance Presentation

	<i>Do not make any statements that misrepresent the investment performance that they or their firms have accomplished or can reasonably be expected to achieve</i>	<i>V(B.1)</i>
	<i>Make every reasonable effort to assure that investment performance history is communicated in a fair, accurate, and complete manner</i>	<i>V(B.2)</i>

16. Sanctions

Every AIMR member (including every holder of the Chartered Financial Analyst® (CFA®) designation) and all CFA candidates must abide by the Code and Standards. The enforcement of the Code and Standards is the responsibility of AIMR's Professional Conduct Program. AIMR members must file an annual Professional Conduct statement with the PCP, identifying any violations in which they may be involved. The PCP, through its Rules of Procedure and policies investigates all self disclosed violations, as well as those brought to the attention of the PCP by outside parties such as employers, regulators, clients and the media. All investigations resulting in a finding of misconduct result in a disciplinary sanction agreed to by the member or imposed by a disciplinary review committee composed of AIMR members. Sanctions range from a private censure to a revocation of membership, candidacy in the CFA Program, and the right to use the CFA designation.

Infringements

a	Charge infringements only to natural persons	AIMR Bylaws
b	If infringement is carried out by legal entities, charge those members who adopted decisions	
c	Consider only infringements undertaken during professional duties	
d	Do not consider those due to errors or accidental lack of knowledge	

Determine the degree of the infringement with regard to:

e	- the damage make to investor	PCP Program Policies
f	- the damage to proper market functioning	PCP Program Policies
g	- the level of investor's capability	PCP Program Policies
h	- the number of investors damaged	PCP Program Policies
i	- the accessibility to markets	PCP Program Policies
j	- the repetition of infringements	PCP Program Policies
k	- the consciousness deliberated and organized punishable acts undertaking	PCP Program Policies
l	- the benefit obtained by the violator	PCP Program Policies

Sanctions

Determine the degree of sanction as follows:

m	- private warning	PCP Rules of Procedure
n	- public warning	PCP Rules of Procedure
o	- temporary suspension for the Association	PCP Rules of Procedure
p	- definitive lending-off from the Association	PCP Rules of Procedure
q	Allow for rehabilitation, accomplishing certain requirements, such as the pay back of the unduly obtained benefits and compensation of injured party	PCP Rules of Procedure