1. Ethics, Trust & Profession

- Ethics: moral principles about acceptable behaviour; Laws: minimum standards, vary by jurisdiction.
- Investment industry relies on *trust* due to intangible products and info asymmetry.
- **Profession**: specialised knowledge, service to others, shared code, continuing education.

2. CFA Institute Code of Ethics

extitMembers and candidates must:

- 1. Act with integrity, competence, diligence, respect.
- 2. Place client and profession interests above own.
- 3. Use reasonable care and independent judgment.
- 4. Promote the integrity of capital markets.
- 5. Maintain and improve professional competence (self & others).

3. Standards I-VII Overview

I. Professionalism: Knowledge of Law; Independence & Objectivity; Misrepresentation; Misconduct.

II. Integrity of Capital Markets: MNPI; Market Manipulation.

III. Duties to Clients: Loyalty/Prudence/Care; Fair Dealing; Suitability; Performance Presentation; Confidentiality.

IV. Duties to Employers: Loyalty; Additional Compensation; Supervisor Responsibilities.

V. Investment Analysis, Recommendations & Actions:

Diligence & Reasonable Basis; Communication; Record Retention. VI. Conflicts of Interest: Disclosure; Priority of Transactions; Referral Fees.

VII. Responsibilities as CFA Member/Candidate: Conduct; Reference to CFA Designation.

4. Professionalism Key Points

- Knowledge of Law: follow strictest rule; dissociate from
- Independence Objectivity: no gifts that compromise research; use firewalls; self-paid due-diligence travel.
- Misrepresentation: no plagiarism; cite data sources; no guaranteed returns.
- Misconduct: no fraud, dishonesty, abuse of employer property.

5. Integrity of Capital Markets

- Material Non-Public Info: MNPI + likely price impact; mosaic theory allowed.
- Establish *firewalls*, watch/restricted lists, pre-clear trades, halt proprietary trading when in possession.
- Market Manipulation: no false rumours, wash trades, squeeze or corners.

6. Duties to Clients

- Loyalty/prudence: IPS, best execution, soft dollars benefit client.
- Fair Dealing: simultaneous dissemination; documented allocation; no front-running.
- Suitability: know-your-client, total-portfolio context, leverage appropriateness.
- Performance: GIPS preferred; full, fair, timely, comparable; include terminated accounts.
- Confidentiality: unless illegal, compelled by law, or client permits.

7. Duties to Employers

- Loyalty until final day; may prepare for departure without solicitation.
- Additional compensation needs written consent.
- Supervisors must design /enforce adequate compliance; decline in writing if impossible.

8. Investment Analysis & Records

- Reasonable Basis: thorough research, data integrity, peer review, stress tests.
- Communication: disclose process, assumptions, risks; separate fact & opinion.
- Records: 7-year retention (or local law longer); firm owns; recreate when switching firms.

9. Conflicts of Interest

- Full, prominent, plain-language disclosure—board seats, family holdings, fee arrangements.
- Transaction priority: Clients \rightarrow Employer \rightarrow Personal. Use blackout periods, pre-clearance, duplicate confirms.
- Referral fees: disclose nature and value to client and employer.

10. CFA Program Responsibilities

- No cheating, exam disclosure, or misuse of materials.
- Use marks as adjective: "John Doe, CFA", "CFA charterholder"; no partial designations, no "CFA Level III" after passing.
- Annual PCS & dues to maintain membership.

11. Ethical Decision-Making Framework

Identify facts & stakeholders \rightarrow Consider duties, conflicts, situational influences \rightarrow Decide & act \rightarrow Reflect post-action. Use checklists, seek counsel, document process.

12. Compliance & Enforcement

- Professional Conduct Program (PCP) investigates via complaints, disclosures, exam proctor reports.
- Sanctions: cautionary letter, public censure, suspension, revocation
- Firms: adopt Code of Ethics, written compliance, whistle-blower hotlines, ongoing training, incident logs.

 ${\it Tulga-Ochir Sugar-Ethics\ Personal\ Cheat\ Sheet\ (not\ exhaustive)}$