

CAA GLOBAL LIMITED

CODE OF CONDUCT

Application	The Code applies to all Actuarial Analyst Candidates admitted by CAA Global Limited to undertake the Certified Actuarial Analyst qualification.
Scope	The Code applies at all times to Actuarial Analyst Candidates' conduct both in the context of their participation in the qualification and in the performance of their professional duties (of whatever nature). The Code will also be taken into consideration where an Actuarial Analyst Candidate's conduct in other contexts could reasonably be considered to call into question their suitability for continued participation in the qualification.
Status and Purpose	The Code consists of principles which Actuarial Analyst Candidates are expected to observe in the public interest and in order to build and promote recognition and confidence in the qualification, in their professional duties and in the certified actuarial analyst profession. The Code will be taken into account if an Actuarial Analyst Candidate's conduct is called into question for the purposes of CAA Global Limited's Disciplinary Scheme.

THE PRINCIPLES

1. **Integrity:** Actuarial Analyst Candidates will act honestly and with the highest standards of integrity.
 - 1.1 Actuarial Analyst Candidates will show respect for others in the way they conduct themselves in their professional lives.
 - 1.2 Actuarial Analyst Candidates will respect confidentiality unless disclosure is required by law, or is permitted by law and justified in the public interest.
 - 1.3 Actuarial Analyst Candidates will be honest, open and truthful in promoting their business services.

2. **Competence and Care:** Actuarial Analyst Candidates will perform their professional duties competently and with care.
 - 2.1 Actuarial Analyst Candidates will consider who their advice and/or services are being provided to (their clients). In many cases this may be their employer.
 - 2.2 Actuarial Analyst Candidates will not act unless:
 - (a) they have an appropriate level of relevant knowledge and skill; or

- (b) they are acting on the advice of an individual who has the appropriate level of relevant knowledge and skill and all interested parties are aware that this is the case; or
 - (c) they are acting under the direct supervision of another Actuarial Analyst Candidate who is taking professional responsibility for that work.
- 2.3 Actuarial Analyst Candidates will consider whether advice from other professionals and other specialists is necessary to assure the relevance and quality of their work.
- 2.4 Actuarial Analyst Candidates will take care that the advice or services they deliver are appropriate to the instructions and needs of the client, including the legal and other rules which may govern the matter, having due regard to others, such as policyholders of an insurer, members of a pension scheme, or any analogous persons whose interests are affected by the work of the Actuarial Analyst Candidate.
- 2.5 Actuarial Analyst Candidates will agree with the client the scope and nature of any appointment or instruction.
- 2.6 Actuarial Analyst Candidates will agree with the client the basis for their remuneration before commencing an appointment or instruction and before any material change in the scope of an existing appointment or instruction.
- 2.7 Actuarial Analyst Candidates will keep their competence up to date.
- 3. Impartiality:** Actuarial Analyst Candidates will not allow bias, conflict of interest, or the undue influence of others to override their professional judgement.
- 3.1 Actuarial Analyst Candidates will ensure that their ability to provide objective advice to their clients is not, and cannot reasonably be seen to be, compromised.
- 3.2 A conflict of interests arises if an Actuarial Analyst Candidate's duty to act in the best interests of any client conflicts with:
 - (a) the Actuarial Analyst Candidate's own interests, or
 - (b) an interest of the Actuarial Analyst Candidate's employer, or
 - (c) the interests of other clients.
- 3.3 Actuarial Analyst Candidates will take reasonable steps to ensure that they are aware of any relevant interest, including income, of their employer.
- 3.4 Unless they decide not to act, Actuarial Analyst Candidates will disclose in writing to their client any steps they have taken, or propose to take, to reconcile any actual or reasonably foreseeable conflict of interest.
- 3.5 Actuarial Analyst Candidates will not act where there is a conflict of interest that has not been reconciled.
- 3.6 Before accepting any assignment, Actuarial Analyst Candidates will consider carefully whether they should consult with any Actuarial Analyst Candidate who previously held such a position with the client, to establish whether there might be any professional reason why the assignment should be declined.

4. **Compliance:** Actuarial Analyst Candidates will comply with all relevant legal, regulatory and professional requirements, take reasonable steps to ensure they are not placed in a position where they are unable to comply, and will challenge non-compliance by others.
 - 4.1 Actuarial Analyst Candidates will speak up to their clients or to their employers, or both, if they believe, or have reasonable cause to believe, that a course of action is unlawful, unethical or improper.
 - 4.2 Actuarial Analyst Candidates will fulfil any obligations to report information to relevant regulatory authorities.
 - 4.3 Where there is legal protection available, Actuarial Analyst Candidates will report behaviour that they have reasonable cause to believe is unlawful, unethical or improper, to regulators or other relevant authorities.
 - 4.4 Actuarial Analyst Candidates will promptly report any matter for consideration under CAA Global Limited's Disciplinary Scheme which appears to constitute misconduct or a material breach of any relevant legal, regulatory or professional requirements imposed by CAA Global Limited from time to time. To the extent that the consent of a third party is required for this purpose in order to disclose information, Actuarial Analyst Candidates must take all reasonable steps to obtain such consent.

5. **Communication:** Actuarial Analyst Candidates will communicate effectively and meet all applicable reporting standards.
 - 5.1 Actuarial Analyst Candidates will ensure that their communication, whether written or oral, is clear (indicating how any further explanation can be obtained) and timely, and that their method of communication is appropriate, having regard to:
 - (a) the intended audience;
 - (b) the purpose of the communication;
 - (c) the significance of the communication to its intended audience; and
 - (d) the capacity in which the Actuarial Analyst Candidate is acting.
 - 5.2 Actuarial Analyst Candidates will, in communicating their professional findings, show clearly that they take responsibility for them.
 - 5.3 Actuarial Analyst Candidates will take such steps as are sufficient and available to them to ensure that any communication with which they are associated is accurate and not misleading, and contains sufficient information to enable its subject matter to be put in proper context.