

STATEMENT OF PROFESSIONAL STANDING

This is to certify that

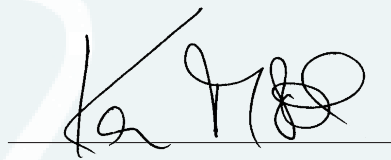
Nicholas Grogan

has fully completed the qualifications requirement, has maintained competence through continuing professional development and had agreed to adhere to the FCA COCON / FCA APER requirements and the CISI's Code of Conduct

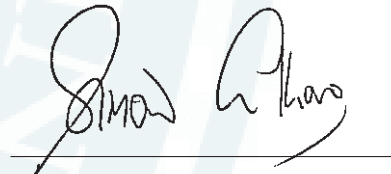
This Statement of Professional Standing
is valid for the period:



13 September 2021 to 12 September 2022



Kevin Moore, Chartered FCSI, Head of Accredited Body,
Chartered Institute for Securities & Investment



Simon Culhane, Chartered FCSI, Chief Executive Officer,
Chartered Institute for Securities & Investment

CISI number: 190999

CISI Membership Grade: CFP Chartered MC&S Date of joining: 28 October 2015

Code of Conduct

Introduction

Professionals within financial services owe important duties to all their stakeholders including clients, market participants, their profession, professional bodies, regulators, colleagues as well as to wider society.

Where these duties are set out in law or regulation, members of the Chartered Institute for Securities and Investment (CISI) should comply with the requirements in both letter and spirit.

Members of CISI are also required to meet the standards set out within the CISI's Principles, which impose an obligation on members to act at all times not only in compliance with the rules, but also to support the underlying purpose and values of the Institute.

Each Principle specifies the duties owed by members to one or more stakeholders who may be impacted by their actions.

There may be situations where professionals are faced with making a decision where the correct course of action is not immediately obvious. In addition to referring to the Code, consideration of the following could help to decide the right course of action.

C lear & Honest	Have I told no lies or 'half-truths' to any party involved in reaching my decision?
I mpartial & Open	Is everyone affected by my action or decision aware of the consequences?
S traightforward & Transparent	Have I made sure that my action or decision will not result in any party being unknowingly disadvantaged or unduly advantaged?
I nformed & Fair	Have I considered the interests of my potential stakeholders and not been misleading when making my decision?

Members seeking further advice about the Code of Conduct are encouraged to contact the CISI for guidance at standards@cisi.org.

Material breach of the Code of Conduct would be incompatible with continuing membership of the CISI and may result in disciplinary action.

www.cisi.org/conduct

The Principles

Personal Accountability - To strive to uphold the highest levels of personal and professional standards at all times, acting with integrity, honesty, due skill, care and diligence to avoid any acts, either in person, in a remote working environment or digitally which may damage the reputation of your organisation, your professional body or the financial services profession.

Stakeholder

Self, Clients, Regulators, Colleagues, Market Participants, Firm, Profession, Society

Client Focus - To put the interests of clients and customers first by treating them fairly, being a good steward of their interests, never seeking personal advantage from confidential information received and utilising client data only for a defined purpose.

Clients

Conflict of Interest - Being alert to and actively manage fairly and effectively any personal or other conflicts of interest, obeying legislation and complying with regulations to the best of your ability, ensuring you are open and cooperative with all your regulators, challenging and reporting unlawful or unethical behaviour.

Clients, Market Participants, Regulators

Respect for Market Participants - To treat all counterparties and business partners with respect, to observe proper standards of market integrity, good practice, conduct and confidentiality required to maintain the highest level of mutual trust.

Clients, Market Participants

Professional Development - To strive continually for professional excellence, committing to Continuous Professional Development (CPD) and promoting and supporting the development of others.

Profession, Clients, Colleagues

Aware of Capabilities - To decline to act on any matter about which you are not competent or qualified unless you have access to such advice or assistance to carry out the work in a professional manner, taking into account the nature of the individual mandates given by your customers and counterparties.

Clients, Profession, Market Participants

Respect Others and the Environment - To treat everyone fairly and with respect, supporting opportunity for all, embracing diversity and inclusion and ensuring that the environmental impact of your work is considered.

Society, Colleagues, Clients, Regulators, Market Participants, Profession, Professional Body

Speak Up & Listen Up - To be active in speaking up and encouraging others to do so by listening up, promoting a safe environment for all and recognising the responsibilities you have to the communities in which you operate.

Society, Colleagues

I adhere to the above principles _____