



AIMS Funds Management
A Member of AIMS Financial Group

CODE OF CONDUCT POLICY

January 2016

AIMS CODE OF CONDUCT

We aspire to be a leader in our field. The success of the Group depends, to a large extent, upon:

- the nurturing of a team approach to the attainment of the business objectives;
- the maintenance of the highest levels of integrity and commitment to client confidentiality;
- the commitment to uncompromising levels of customer service; and
- aiming to be the best in all facets of our business.

Central to this is how we do business. Our Employees (directors, staff and contractors) are required to act with the utmost integrity, objectivity and in compliance with the law and the company policies at all times in their dealings with each other, competitors, customers, suppliers, the company and the community.

The following sets out the required Code of Conduct to be observed by all Employees. The Code of Conduct document has been prepared to ensure that team members adhere to a strict regime of fiduciary responsibility.

Employees should observe the highest levels of professional conduct in undertaking their business activities, in light of the core values of:

- Trust
- Integrity
- Honesty
- Respect

Accordingly, Employees should conduct their business affairs in accordance with this Code of Conduct by:

- Acting in the best interests of our clients and shareholders and not allowing their own interests or those of their employer to override the interests of our clients and shareholders;
- Acting with due skill, care and diligence in conducting their business;
- Preserving client confidentiality at all times;
- Respecting the intellectual property rights of others;
- Protecting and promoting the integrity of the market;
- Avoiding and/or disclosing any real or perceived conflicts of interest;
- Being true to their word;
- Respecting the dignity of others;
- Never knowingly misleading or deceiving others.

The Code is discussed with each new Employee as part of their induction training.