

# Code of Ethics

1. We always act honestly, fairly, professionally and with integrity, due skill, care and diligence.
2. We seek to secure our customers' interests in all aspects of our business including in our culture, strategy, business model, customer interactions, product distribution arrangements and day-to-day operations and decision making.
3. We commit to maintaining the highest standards of professional competence, knowledge and skills required for our roles and responsibilities.
4. We provide information in a way that informs customers effectively, which is honest, clear, accessible, and in plain language so customers can understand options, risks and next steps.
5. We ensure our customers have time and space to make decisions, supporting autonomy and avoiding practices that could pressure or unduly influence decisions.
6. We ensure that digital interactions including digital journeys, tools and communications, and online information are easy to use, understand and navigate, and do not exploit customer behaviour or biases or manipulate, unfairly pressurise or mislead customers.
7. We respect and protect our customers' privacy and confidentiality, keep all personal information secure and handle it responsibly and proportionately.
8. We are committed to equality, diversity and inclusion in all our activities. We recognise that some customers may be in vulnerable circumstances and take reasonable steps to support their needs.
9. We will control and manage our affairs to counter the risks of financial abuse to customers including ongoing monitoring of potential vulnerabilities and having plans in place to address any fraudulent or deceptive activities.
10. We include environmental, social and governance issues in our decision making and ensure any sustainability related statements in our communications are fair, accurate and not misleading.
11. We seek to avoid conflicts of interest but, if one does arise, we disclose it so that appropriate action can be taken to avoid, mitigate or minimise it. We recognise that commission-based remuneration can give rise to potential conflicts of interest. We monitor and review our remuneration and performance arrangements to ensure they support fair customer outcomes and comply with our obligation to secure customers' interests.
12. We take ownership and responsibility for managing errors, breaches, complaints, risk events and wrongdoing that affect customers and we have in place adequate governance arrangements to effectively identify, report, track, manage, and resolve them including addressing customer detriment appropriately.
13. We cooperate in good faith and without delay with the Central Bank of Ireland, and other regulators and internal governance requirements.
14. We abide by all provisions of law and regulations relating to our business.
15. We seek to advance the reputation of financial services, insurance and financial advice through our conduct.

**IF YOU ARE IN DOUBT ABOUT WHAT TO DO IN ANY SITUATION,  
SEEK ASSISTANCE FROM YOUR MANAGER OR CONTACT COMPLIANCE.**

**E**

Excellence

**T**

Team Work

**H**

Honesty

**I**

Integrity

**C**

Commitment

**S**

Sincerity