



Holders of the Registered Financial and Retirement Advisor<sup>®</sup> (RFRA<sup>®</sup>) designation shall maintain the highest standards of professional conduct in dealing with clients and the public. An RFRA credential holder has obligations to the profession of retirement planning and financial advising more broadly. The following outlines the principles of conduct demanded of a Registered Financial and Retirement Advisor professional.

# REGISTERED FINANCIAL AND RETIREMENT ADVISOR PROFESSIONALS: CODE OF CONDUCT

## CONDUCT WITH CLIENTS

A Registered Financial and Retirement Advisor credential holder shall act professionally and with the highest standard of care for his or her clients. The principles noted below should be adhered to in all client situations—regardless of the specific engagement or the nature of the relationship.

### PRINCIPLE

### DEFINITION

#### CLIENT FIRST

In all aspects of his or her engagement with clients, a Registered Financial and Retirement Advisor professional must place the interests and well-being of his or her clients above all other interests including the self-interests of the credential holder. The Client First principle takes precedence over all other factors when dealing with clients.

#### BEST INTERESTS AND DUTY OF CARE

In all aspects of his or her engagement with clients, a Registered Financial and Retirement Advisor professional must provide advisory services that are in the best interests of his or her clients. A Registered Financial and Retirement Advisor professional has a duty of care to his or her clients when providing advisory services, including recommendations, to ensure they are appropriate, reasonable, prudent and, above all else, reflect the best interests of clients at all times.

## CONFLICTS OF INTEREST

A Registered Financial and Retirement Advisor professional shall avoid conflicts of interest—both real and perceived—to the extent it is reasonably practicable. Where a conflict is unavoidable, a credential holder must disclose the nature of the conflict and importantly, the implications of the conflict to the client. The disclosure must be in full and must detail all material aspects of the conflict, must be in writing and in understandable language and must be delivered to the client in a timely manner.

Where a client has made the **informed decision** to continue his or her engagement with the credential holder notwithstanding the existence of the conflict, the credential holder must manage the conflict in favour of the client.

A Registered Financial and Retirement Advisor professional must promptly disclose any relationship that might be construed as affecting his or her independence and objectivity in offering advisory services to clients. An RFRA professional must abstain from intervening in the personal affairs of his or her clients that are unrelated or that fall outside the defined parameters of the client engagement.

## INTEGRITY

A Registered Financial and Retirement Advisor professional shall conduct his or her dealings with clients with integrity and in a trustworthy manner. The concept of integrity is incapsulated (but, is not limited to) characteristics such as intellectual honesty, impartiality, fairness, full disclosure of material facts and placing the best interests of the client above all other considerations. An RFRA credential holder must adhere to the moral and ethical professional standards that espouse the principle of integrity.

## OBJECTIVITY

A Registered Financial and Retirement Advisor professional is expected to be objective in recommending products and providing advisory services to clients. An RFRA professional shall recommend the best-suited products and services based on the needs of the client and his or her particular circumstances and comfort level. Recommendations must be made according to their suitability to the client above all other considerations and must include all relevant material information such that the client can make an informed decision about the recommendation and provide informed consent if in agreement.

When helping a client implement recommendations, objectivity means a Registered Financial and Retirement Advisor professional must present a client with a range of potential investment products/options and must discuss the pros and cons of each product/option in a fair and impartial manner

accompanied by a full disclosure of all material facts. An RFRA professional must guard against only recommending investment products/options from which the credential holder derives a personal benefit (monetary or otherwise) without first having an objective discussion of alternate products/options that may also be appropriate for the client.

## COMPETENCE

A Registered Financial and Retirement Advisor professional is expected to have the technical skills, knowledge and proficiencies necessary to provide advisory services to clients in a competent manner. An RFRA professional shall only provide services and recommend products to clients if he or she is qualified and/or licensed to do so. When advisory services are beyond the scope of the qualifications of the credential holder, a Registered Financial and Retirement Advisor professional shall seek the counsel of, or refer the client to, other qualified individuals as appropriate. All services offered to clients shall be provided in a timely manner.

## CONFIDENTIALITY

A Registered Financial and Retirement Advisor professional has access to the sensitive personal and financial information of his or her clients and as such, the credential holder shall protect, with adequate safeguards in place, the privacy of clients by keeping all of their personal and financial information confidential and free of discrimination at all times.

A Registered Financial and Retirement Advisor professional shall never divulge confidential client information to any party without the express written consent of the client, except as required by law.

A Registered Financial and Retirement Advisor professional shall not use confidential client information for his or her personal benefit.

## DILIGENCE AND DISCLOSURE OF SCOPE OF SERVICES

A Registered Financial and Retirement Advisor professional shall exercise due diligence in the course of providing advisory services to clients. A credential holder shall ensure that he or she has gathered sufficient information and knowledge about a client and his or her circumstances, in keeping with the Know Your Client (KYC), Know Your Product (KYP) and suitability determination obligations, before providing the client with advisory services and before making recommendations. A credential holder has an obligation to ensure information about his or her clients is current and is updated on a regular basis or as material changes arise.

A Registered Financial and Retirement Advisor professional must make recommendations based on empirical evidence to the greatest extent possible, bearing in mind the balance of probabilities (both in regard to frequency and degree) associated with variable outcomes.

A Registered Financial and Retirement Advisor professional must disclose the scope of the advisory services he or she is able and qualified to provide to clients. The credential holder must also inform clients of advisory services and products he or she is *not* qualified to offer if such services and products might reasonably be expected to fall under the scope of the engagement with the client.

A Registered Financial and Retirement Advisor professional must never hold himself or herself out—intentionally or inadvertently—in a way that could mislead a client, or a prospective client, with regards to his or her qualifications or proficiencies and/or the products or advisory services he or she can offer to clients. Similarly, an RFRA professional must refrain from using titles that are sales-based or that could imply a level of proficiency or qualification that the credential holder does not possess and that could be misleading to clients.

A Registered Financial and Retirement Advisor professional must disclose to clients, in writing, any material changes to the engagement that may arise. The credential holder must make this disclosure in a timely manner and must describe in detail the circumstances relating to the change and sufficient information to enable the client to make an informed decision as to whether or not he or she would like to continue with the engagement. If the engagement is terminated, it should be undertaken with care such that the client does not incur any detrimental outcomes.

## DISCLOSURE OF INFORMATION AND COMPENSATION

A Registered Financial and Retirement Advisor professional is required to disclose all material information to clients, in keeping with relationship disclosure information obligations, that may reasonably be construed to potentially impact the engagement. **This includes disclosing to clients and prospective clients, in a timely manner, that the individual holds the Registered Financial and Retirement Advisor designation in good standing (provided such disclosure is factually accurate).**

All assumptions and limitations contained within a retirement/financial plan and that apply to the scope of the engagement more broadly, must be disclosed in writing to the client. Facts and data used as part of the advisory services offered

by a credential holder, particularly, when incorporated into recommendations to clients, should be from a reputable source and the source should be referenced within the plan. Opinions and biases of the credential holder, subject to the *Best Interests and Duty of Care Principle*, that are used within a retirement/financial plan or as part of recommendations to clients should be identified as such and should be distinguished from fact in a written disclaimer.

A Registered Financial and Retirement Advisor professional is required to disclose to clients the form and amount of his or her compensation for providing advisory services. The credential holder must also disclose agency or employment relations with any third party. More broadly, a credential holder must provide information as required by the laws and regulations that are applicable to the engagement.

## PROFESSIONAL DEVELOPMENT

A Registered Financial and Retirement Advisor professional shall maintain and improve his or her technical skills and knowledge by satisfying his or her annual continuing education obligations. A credential holder must remain proficient by ensuring he or she is up-to-date with changes in retirement planning, financial advising in general, legislation and related matters. As required to provide advisory services to clients, a credential holder must maintain his or her professional qualifications, designations and/or licenses.

## PROFESSIONALISM

A Registered Financial and Retirement Advisor credential holder must provide advisory services to clients in a professional manner. More broadly, professionalism means an RFRA credential holder must not engage in unbecoming conduct or conduct that is contrary to the letter or the spirit of the Principles contained in this Code of Conduct.

For a Registered Financial and Retirement Advisor credential holder, professionalism includes (but, is not limited to) exercising diligence and sound judgement in his or her work and being respectful, honest, impartial and always placing the best interests of his or her clients above all other factors.

The Principle of Professionalism aggregates all of the other Principles under this Code of Conduct.

## PROFESSIONAL CONDUCT

A Registered Financial and Retirement Advisor credential holder shall act in a manner that reflects positively on his or her profession. The following are the general principles of professional conduct to which a Registered Financial and Retirement Advisor credential holder shall abide.

### PRINCIPLE

### DEFINITION

#### POSITIVE IMAGE AND REPUTATION

Actions of a Registered Financial and Retirement Advisor credential holder must always reflect positively on other RFRA credential holders, CIFP and the profession of retirement planning and financial advising more generally.

A Registered Financial and Retirement Advisor credential holder shall engage only in activities that contribute to and enhance the image of both his or her profession and CIFP.

A Registered Financial and Retirement Advisor credential holder shall not denigrate another credential holder, his or her firm or CIFP and shall not bring his or her profession or CIFP into disrepute.

A Registered Financial and Retirement Advisor professional shall not engage in or associate with individuals who engage in any activities that would detract from a positive image, including behaviour such as, but not limited to: fraud, misrepresentation, deceit and the making of false or misleading statements.

A Registered Financial and Retirement Advisor professional shall not speak or act in a manner that may lead another individual to believe he or she is officially representing CIFP, the CIFP Retirement Institute or any organization affiliated with CIFP unless they have been authorized to do so by CIFP.

#### DISCLOSURE OF VIOLATIONS AND DISCIPLINARY AND ENFORCEMENT ACTIONS

A Registered Financial and Retirement Advisor professional must report knowledge of any violations of this Code of Conduct to CIFP in writing and must do so within prescribed time limits.

A Registered Financial and Retirement Advisor credential holder who is guilty of an infraction or who is the subject of a disciplinary or enforcement action from any other organization, professional association, credentialing body or regulatory body must notify CIFP in writing in a timely manner. Following an impartial review of the circumstances, CIFP may impose sanctions on the Registered Financial and Retirement Advisor credential holder in accordance with the facts of the case.

## COMPLIANCE

A Registered Financial and Retirement Advisor professional shall comply with all applicable laws, by-laws and regulations of the governments, self-regulatory organizations and other oversight bodies where he or she resides and/or offers advisory services. An RFRA credential holder shall also comply with all rules, laws and by-laws of other professional associations to which he or she belongs.

It is the responsibility of a Registered Financial and Retirement Advisor professional to remain up-to-date on his or her legal and regulatory requirements to operate in his or her jurisdiction. A credential holder shall not engage in conduct involving fraud, deceit, misrepresentation or any activity that could reasonably be construed to contravene the letter and the spirit of the Principles contained within this Code of Conduct.

# SELF-DECLARATION QUESTIONS

## DISCLOSURE

- 1) Have you or, any business with which you are associated, ever been charged with, pleaded guilty to or convicted of a criminal offence that you have not previously disclosed to CIFP? **( YES / NO )**

If you have answered 'YES' to this question, please refer to the *Acknowledgements* section below for your obligation to inform CIFP of the details of the charges or conviction.

- 2) Are you, for any reason, the subject of an ongoing inquiry, investigation, disciplinary hearing or enforcement action by a tribunal, court, self-regulatory body, licensing body or professional oversight body? **( YES / NO )**

If you have answered 'YES' to this question, please refer to the *Acknowledgements* section below for your obligation to inform CIFP of the details of the inquiry, investigation, disciplinary hearing or enforcement action.

- 3) Have you **ever** been the subject of an inquiry, investigation, disciplinary hearing or enforcement action under which you have been found guilty of professional misconduct by a tribunal, court, self-regulatory body, licensing body or professional oversight body that you have not previously disclosed to CIFP? **( YES / NO )**

If you have answered 'YES' to this question, please refer to the *Acknowledgements* section below for your obligation to inform CIFP of the details of the inquiry, investigation, disciplinary hearing or enforcement action.

- 4) Have you or, any business with which you are associated, **ever** been the subject of a complaint, inquiry, investigation, disciplinary hearing or enforcement action in connection with holding an approved financial planning or financial advising credential or a financial services license/registration that you have not previously disclosed to CIFP? **( YES / NO )**

If you have answered 'YES' to this question, please refer to the *Acknowledgements* section below for your obligation to inform CIFP with regards to the complaint, inquiry, investigation, disciplinary hearing or enforcement action.

- 5) Have you **ever** been convicted or made an offer or settlement in a civil proceeding pertaining to the misappropriation of funds, fraud and/or misrepresentation that you have not previously disclosed to CIFP? **( YES / NO )**

If you have answered 'YES' to this question, please refer to the *Acknowledgements* section below for your obligation to inform CIFP with regards to the civil proceeding.

- 6) Have you **ever** filed or declared bankruptcy or filed a consumer proposal that you have not previously disclosed to CIFP? **( YES / NO )**

If you have answered 'YES' to this question, please refer to the *Acknowledgements* section below for your obligation to inform CIFP with regards to your bankruptcy or consumer proposal.



## ACKNOWLEDGEMENTS

- 1) In all aspects of my engagement with clients, I have placed the interests and well-being of my clients above all other interests, including my self-interests.
- 2) To the extent that is reasonably practicable, I have avoided conflicts of interest—both real and perceived—in my dealings with clients. Where a conflict has been unavoidable, I have disclosed to the client—fully and in writing—the nature of the conflict and what the implications of the conflict are to the client. Where a client has made the informed decision to continue their engagement with me, notwithstanding the existence of the conflict, I have managed the conflict in favour of the client.
- 3) I have disclosed to clients all material information that may reasonably be construed to potentially impact the engagement. This includes disclosing to clients and prospective clients, in a timely manner, that I hold the Registered Financial and Retirement Advisor designation in good standing (provided such disclosure is factually accurate).
- 4) I understand and agree that, as a Registered Financial and Retirement Advisor credential holder, I must fulfill my professional and ethical obligations as outlined in the Code of Conduct applicable to the designation.
- 5) I agree to notify CIFP in writing within 10 business days of any disciplinary proceeding or legal action initiated against me and of the disposition of such proceedings as soon as available.
- 6) I agree to notify CIFP in writing within 10 business days of becoming aware of a complaint, investigation or disciplinary or enforcement action filed against me in connection with holding an approved financial planning or financial advising credential or a financial services license/registration.
- 7) For any self-declaration question in the previous section to which I have answered 'yes', I agree to provide CIFP with full details relating to the matter addressed in the question.
- 8) I understand and provide my consent, that following the completion of an impartial and fair assessment, CIFP reserves the right to publish the full details of any matter addressed in the self-declaration questions in the previous section to which I have answered 'yes' on the CIFP, CIFP Retirement Institute and/or the Chartered Institute of Financial Planning Web sites and/or share this information with other approved credentialing bodies, regulatory or licensing bodies, relevant self-regulatory organizations and oversight bodies if doing so preserves the best interests of the public.
- 9) I authorize CIFP to collect my relevant personal information and to use, disclose and store this information in accordance with CIFP's Privacy Policy.

10) I understand and provide my consent, that to preserve the best interests of the public, following the completion of an impartial and fair disciplinary process, CIFP reserves the right to publish full details of any disciplinary proceeding or legal action that I am the subject of on the CIFP, the CIFP Retirement Institute and/or the Chartered Institute of Financial Planning Web sites and/or share this information with other approved credentialing bodies, regulatory or licensing bodies, relevant self-regulatory organizations and oversight bodies.

Registered Financial and Retirement Advisor professionals who violate the Code of Conduct applicable to the designation may be subject to disciplinary action and any approval granted pursuant to this application may be terminated or suspended at any time by the CIFP Retirement Institute Board of Directors and the Committees thereof, in accordance with the applicable By-Laws, rulings, rules and regulations, Code of Conduct for Registered Financial and Retirement Advisor credential holders.

Any application containing a false statement may result in the refusal or cancellation of your status as a Registered Financial and Retirement Advisor credential holder.

As a Registered Financial and Retirement Advisor credential holder, I agree to abide by the terms and conditions set out in this document and my signature below is my attestation that the information I have provided to CIFP is accurate, true and complete. **Please complete and submit the *Self-Declaration* section of this document online or mail a completed paper copy to CIFP.**

EXECUTED AT \_\_\_\_\_, \_\_\_\_\_  
(CITY) (PROVINCE)

ON THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, \_\_\_\_\_  
(DAY) (MONTH) (YEAR)

**NAME** \_\_\_\_\_ **TITLE** \_\_\_\_\_

**REGISTERED FINANCIAL AND RETIREMENT ADVISOR LICENSEE NUMBER** \_\_\_\_\_

**SIGNATURE** \_\_\_\_\_