

# ICE Code of Ethics

- Our staff shall strive to constantly improve their own compliance expertise, knowledge and competence and that of others in the industries that they serve.
- Our staff shall exercise independent and professional judgment in all dealings with clients.
- Our staff shall avoid conflicts of interest arising between themselves and our clients in the performance of their duties. Where conflicts may arise or may be perceived to arise which could impact on their ability to render an unbiased and objective service, our staff will disclose such conflicts or perceived conflicts to all relevant stakeholders.
- ICE will maintain adequate resources, including financial and physical resources required to operate effectively and efficiently.
- ICE shall fully disclose to clients the manner in which ICE is to be remunerated. This will include the methods applied in calculating the remuneration as well as any indirect benefits.
- ICE shall enter into formal, written agreements with clients which in addition to disclosing full remuneration detail shall include any limits of liability.
- ICE shall not misrepresent the terms and conditions of appointment; neither shall ICE misrepresent the capabilities of staff, their credentials, qualifications and experience regarding the industry or nature of the service to be provided.
- ICE shall only accept new engagements for which the company has been appropriately authorized by the necessary regulatory authorities (where applicable), and for which staff are adequately trained and possess the requisite skill, expertise and experience.
- Our staff shall observe the confidentiality of all information they obtain by way of the services they render to clients, unless a legal obligation to disclose such information appropriately exists or should arise. Information obtained as a result of an appointment shall not be used for personal or company gain other than that fully disclosed to and agreed upon by clients.
- Our staff shall avoid making malicious statements that have the potential to damage the reputation of any professional body, compliance practitioner, competitor or any participant in the compliance profession generally.
- Our staff shall in performing their functions:
  1. make full and reasonable enquiry into the client's compliance risk profile, compliance experience and business objectives prior to making any recommendations and shall furthermore review the appropriateness of such recommendations periodically;
  2. not make any recommendations nor take any action prior to having reasonably determined that such recommendations will in fact suit the client's particular needs, risk profile, experience and business objectives;
  3. apply intellect and exercise diligence and thoroughness in making any recommendations;
  4. have a reasonable basis for making any recommendations or performing any actions as supported by appropriate research and investigation;
  5. not make any recommendations that are superfluous to clients' requirements.