



# Fingeste

## CODE OF ETHICS

**At Fingeste, Values are treated seriously and by that we mean we give the most importance to our:**

### I) Code of Ethics and Standards of Fingeste's Professionals Conduct

Fingeste claims compliance with the CFA Institute Code of Ethics and Standards of Professional Conduct. Despite this claim has not been verified by CFA Institute, in our company we honestly promote the following values and attitudes:

- We act with integrity, competence, diligence, respect and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets.
- We place the integrity of the investment profession and the interests of clients above their own personal interests.
- We use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities.
- We practice and encourage others to practice in a professional and ethical manner that will reflect credit on themselves and the profession.
- We promote the integrity and viability of the global capital markets for the ultimate benefit of society.
- We maintain and improve their professional competence and strive to maintain and improve the competence of other investment professional.

### II) Fingeste Asset and Investment Code of Conduct

1. We act with loyalty and proper purpose. Our governance is conducted by the following rules:

- Establish sound investment management practices that seek to maximize impact of the organization's activities.
- Understand the organization's mission and appropriately consider its impact within the investment strategy.
- Place the interest of the organization, its donors, and its beneficiaries above their own.
- Avoid conflicts of interest pertaining to the implementation of the organization's investment strategy whenever possible. Disclose annually and manage actual and perceived conflicts of interest that realistically cannot be avoided.
- Not solicit, offer, or accept any gift, benefit, or consideration personally that could reasonably be expected to affect their loyalty to the organization.
- Not place unreasonable constraints on future Governing Body members in the management of the endowed resources.

Cont.



# Fingeste

2. We act with skills, competence, prudence, and reasonable care:

- Dedicate sufficient time to prudently implement the organization's investment objectives and policies.
- Maintain an appropriate level of knowledge of investment markets, products, and strategies in order to fulfill their duties.
- Have a reasonable and adequate basis for investment decisions supported by active and thorough due diligence of the investment strategies of the organization.
- Appropriately manage the financial risks of the organization and the endowed resources.
- Utilize external professionals when appropriate in the development, implementation, and review of the organization's investment strategy. C. Abide by all laws, rules, regulations, and founding documents.

3. We Abide by all laws, rules, regulations, and founding documents. This means:

- We understand and ensure compliance with the laws, regulations, and governing documents pertaining to the organization's investment practices.
- With regard to the organization's financial resources, report any suspected illegal, unethical, or financial irregularities to the appropriate parties

4. Show respect for all stakeholders:

- Take actions to maximize benefits from the endowed resources for the intended lifespan of the organization.
- Ensure a proper balance of all applicable stakeholders' interests in the operations of the organization while respecting the intention of the organization's donors.
- Seek to minimize the volatility of beneficiary and operational budgetary support through prudent financial management.
- Maintain confidentiality and establish policies and procedures that address retention and/or redistribution of information.
- Communicate with stakeholders in a timely, accurate, and transparent manner.

5. Review investment strategy and practices regularly. Our governance:

- Assess the performance and integrity of investment managers in stewardship of the endowed resources by an agreed upon set of standards, benchmarks, and metrics.
- Review the actions of the investment committee regarding performance in implementing and adherence to the principles of the organization's investment strategy and policies.
- Review and adjust investment practices and strategies to best meet the organization's objectives and to maximize benefits available from the endowed resources.

End.