



**WealthInterPro - International Association of Estate Planning,
Wealth Management and Business Immigration Specialists**

CODE OF BUSINESS CONDUCT AND SPECIAL PROGRAM ADMINISTRATION GUIDE

Participants in the Global Partnership and Business Conduct Network can be any person, both physical and legal, willing to accept the obligations stipulated by this Code, thereafter “Participants” or “Participant”.

To join the Global Partnership and Business Conduct Network, you have to send an application to the WealthInterPro Association, receive approval and pay an admission and membership fee to the Association. Admission is made by the decision of the Board of the Association. The Participant receives a certificate that confirms his or her participation in the Global Partnership and Business Conduct Network.

The goal of the Program is to create a community of professionals who voluntarily adhere to a comprehensive agreement on the following the rules of business conduct towards each other and consumers.

The rules established by this Code apply to participants of the Program even if national laws establish lesser rules. Compliance with the law, in this case, is one of the rules of this Code.

Participants of the Program consentaneously strive to ensure the belonging to the Program to be a “quality mark” that is credible to consumers and other professionals.

1. Rules to be executed by the participants of the Program

1.1. Fair competition

The rule: "Praise your goods and do not depreciate the goods of others."

When promoting products and services in the market, the Participant undertakes to avoid spreading negative information or statements about other Participants, their products and services.

1.2. Fulfilment in good faith of obligations to each other

Participants guarantee to each other complete, faithful fulfilment of obligations stipulated by these rules, other rules that may be established and voluntarily accepted by Participants in the future, as well as any other obligations that may arise between Participants on the basis of their agreements, both written and oral. The Association provides its members with technical capabilities for quick and objective written and oral processing of any agreements as well as monitoring their implementation.

Third parties (not Participants and not members of the Association), in respect of whom Participants have made an obligation, also have the right to apply to the Association and, if the Participant confirms the fact of such obligations to a third party, they have the right to use the compliance with commitments monitoring mechanisms provided by the Association.

1.3. Commission payment guarantee

At the time of entry or at any later time, Participants declare to other Participants their commission policy with an indication of the amount of remuneration and the terms and conditions of payment. The stated policy must be strictly followed by each Participant in relation to all other Participants. The Association provides Participants with technical capabilities to monitor the mutual compliance with the commission policy and the timely payment of commissions between the Participants.

Third parties (not Participants and not members of the Association), in respect of whom Participants have made an obligation to pay commissions, also have the right to apply to the Association, and if the Participant confirms the fact of such obligations to a third party, they have the right to use the monitoring mechanisms of the compliance with commitments to pay commissions provided by the Association.

1.4. Information exchange

In order to ensure the successful performance of the Program and ensure the Integrated Approach as a method of working with customers, Participants should inform each other as much as possible about their products and services, about changes in the market, in laws of different countries, consumer needs and demands and their dynamics, provide other important information. One of the goals of information exchange is to provide each other (and employees) with the opportunity to correctly identify non-core consumer requests and see opportunities to promote the services of other Participants and, accordingly, to receive commissions.

The Association provides technical opportunities for the effective exchange of information through the organization of events (seminars, round tables, conferences, etc.), including online, sending written materials to Participants, publishing reference books, newsletters, magazines.

1.5. Compliance with customer service rules

The purpose of the rules is to create an exchange of clients and business information, as a result of which each Participant will be sure that:

- a) If she/he transfers a client to another Participant to receive a service, a client will only be provided with a service for which she/he is sent and/or other services, provided that the Participant who sends a client does not provide these services. A client will be sent back to receive all the services that this Participant provides.
- b) She/he will receive a commission from any Participant, whoever the client selects.
- c) If in the process of working with a client a Participant to whom the client has been transferred, it turns out that a client needs services of other Participants, then the Participant who originally sent the client is entitled to the commission paid by each of the Participants who performed the work for a client.
- d) If, when working with a client, a Participant sees that a client needs professional assistance provided by other Participants, she/he should recommend using the service of other Participants only, even if she/he knows the relevant specialists who are not Participants of the Program.
- e) When recommending the services of other Participants to clients, Participants do not impose or recommend anyone specific but provide a client with the choice from the list of Participants that provide specific services/products.
- f) Participants do not provide services that are not relevant to them and do not advise on issues outside their competences, do not dissuade a client from receiving professional

assistance/advice, even if as a result a client may not buy a service/product of this professional.

- g) Participants who have received a client from other Participants do not dissuade clients from purchasing the product service of the Participant whom a client has contacted and upon whose recommendation she/he has come, do not redirect a client to other professionals, including Participants, to obtain the same service/product.

1.6. Compliance with the rules of recommendation to clients of other Participants and their services

When recommending to a client certain services/product, Participants present a client complete information about all Participants that provide the necessary services/products. The choice of the specific professional from whom a client will purchase a service/product remains with the client.

1.7. Supporting an integrated approach to customer service and participating in the development of this method

When proposing to a client to purchase a specific product/service, a professional is primarily guided by the interests of a client and encourages her/him to use an integrated approach when making decisions. She/he must should make sure that the client makes the decision having complete, truthful, relevant information not only about a product/service itself but also about all risks, side effects. If necessary, Participants should prompt a client to get the necessary advice from other Participants, within their competence, to consider task comprehensively, taking into account all the significant nuances, and make a decision being fully informed and aware of both positive and negative consequences and risks.

2. Rules to be executed by the participants of the Program in relation to consumers

Participants acknowledge that consumers, not being professionals, are in a more vulnerable position and should be protected by the maximum disclosure of reliable information and qualified service from professionals.

2.1. Disclosure of information about products/services, both positive and negative.

Participants commit themselves to clients to fully and thoroughly, conscientiously and objectively inform about the products and services they offer, highlighting both their positive and negative features. The rule: “When telling about the magnificent beaches, do not forget to talk about the rainy season and mosquitoes.”

2.2. Disclosure of full financial information about all expenses that arise or may arise in connection with the purchase of products/services, including in connection with a change in the terms and/or other circumstances.

Participants commit themselves to clients to fully and comprehensively disclose all information about all payments and their components that a client must pay for the services or products provided, related charges, fees, interests, surcharges, additional payments, penalties, fines, payments for counterparty services, payments for maintenance and service, and any other payments that arise or may arise in connection with the purchase of services or products.

2.3. Disclosure of information about possible risks that a client may incur in connection with the purchase of products/services, including in other jurisdictions.

Participants commit themselves to clients to carefully consider the risks and obligations that arise or may arise in other jurisdictions in connection with the purchase of a particular product or service, and either to inform a client in a qualified and comprehensive manner about these risks if this Participant is a specialist on such issues, or offer a client to use the services of other Participants, who claim to be specialists in these issues and jurisdictions, offering a client to pick

up a consultant on these issues among the Participants. At the same time, Participants should not specifically recommend this or that specialist, but offer the entire list of Participants who are specialists in these issues and jurisdictions.

2.4. Do not decrease the value of possible risks and do not encourage the consumer to purchase a product/service without receiving complete information.

Participants commit themselves to clients to encourage them to receive complete and comprehensive information about any risks that are known to a Participant and those that may arise in a client in other jurisdictions or areas in which this professional does not specialize. The Participant's task is to create conditions, including by attracting other Participants, when a client decides to purchase products and services "with open eyes", being as informed as possible of all obligations, risks, consequences, evaluating them and making an informed decision, being fully informed and warned.

2.5. Promote in every possible way an "integrated approach" as the main method of working with clients.

Participants commit themselves to consumers and other Participants to proceed from the fact that on the markets of succession planning, estate management and business immigration and related to them the rules must prevail that provide consumers with products and services selected individually, based on the needs of each client, his/her family, future generations. Based on this, the task of each of the Participants is not only to sell their product or services, but also to provide an integrated approach to the needs of a client with the help of other Participants.

2.6. Maintain confidentiality and take all technical and organizational measures to protect the data of clients.

3. Management and maintenance of the Program

The management and maintenance of the Program are carried out by the WealthInterPro Association. All decisions are made by the Board of the Association.

Participants may submit proposals for amending the Code by December 25, 2020.

Participants can make suggestions for improving the Program.

The Board of the Association appoints an Ombudsman from the Participants. The Ombudsman monitors compliance with the rules established by this Code by Participants, receives complaints of violations, clarifies the circumstances of violations, helps to eliminate violations and compliance with the Code.

* The first Ombudsman is the President of the Association until his decision to leave this position. The candidatures of all of the following Ombudsmen are approved by the Board of the Association at the proposal of the President of the Association.

The Council of participants is created from the Participants that consists of from three to five people, one of which is the Ombudsman, and the composition of which is approved by the Board of the Association.

The Council considers complaints of the Participants regarding violation of the Code, Ombudsman's reports on his consideration of the circumstances of the violations committed and the results of attempts to eliminate violations. If a violation is obvious, attempts to eliminate it were unsuccessful, or violations are repeated, the Council introduces the question of expelling a participant from the Program to the Board of the Association that approves the decision of the Council.

Participants who violate the rules of conduct established by this Code, as well as not paying timely appropriate contributions and payments, may be excluded from the Program by the decision of the Board of the Association.

All Participants agrees to post banners of the Association and the Program on their websites on the main page.

Program participant certificates are placed by Participants at the reception of offices, in meeting rooms, private offices of CEOs, in the offices of branches and representative offices and their CEOs.

The Association:

- 1) keep records of Participants of the Program;
- 2) carries out the processing of applications for admission;
- 3) makes a reception at meetings of the Board of the Association and draws up relevant decisions;
- 4) accepts admission and other fees, deposits and payments;
- 5) organizes the work of the Ombudsman and the Council of Members;
- 6) consider representations of the Council on exclusion from the Program in connection with a violation of the Rules;
- 7) provides technical capabilities for accounting and maintaining the obligations of Participants to pay commissions and other mutual obligations of Participants, as well as taking into account clients' appeals to Participants as a result of recommendations of other Participants;
- 8) provides technical support for the exchange of information (holding webinars, publishing newsletters, other printed materials, organizes seminars, conferences, congresses, etc.);
- 9) issue the necessary certificates to Participants in the required quantity;
- 10) post information about Participants on the Association website in accordance with standards approved by the Board of the Association;
- 11) provides Participants with the opportunity to post information on the Association's website in sections for Participants, as well as in print media under conditions approved by the Board of the Association.

The Association strives to optimize the service for the Participants and therefore reserves the right to change the above list taking into account the needs of the Program and the wishes of its Participants.

** Special Global Partnership and Business Conduct Network Program (Special GPBCN Program) is a project created to bond together its members on the basis of common criteria and rules of business conduct and partnership.*

The Special GPBCN Program has been created and managed by the International Association WealthInterPro RY (Finland).

The members of the Association can be the members of the Special GPBCN Program, but participation in the Special GPBCN Program is not the same as membership in the Association.

The participants of the Special GPBCN Program can be any individuals and legal entities voluntarily who accept the rules stipulated by the Code of Business Conduct and are adopted into the Special GPBCN Program by a decision of the Board of the Association.