



**CiServices Building Asset Manager
Code of Professional Conduct**

CiServices Building Asset Manager Code of Professional Conduct

Commercial and Industrial Services Pty Ltd (“CiServices”) has been formed explicitly to support the Strata Industry in achieving the highest standards of Building Asset Management.

Building Asset managers in particular hold a unique place of trust in the lives of residents. Professionals and firms who undertake and perform their responsibilities with honesty and integrity are critical to maintaining residents trust and confidence and upholding the client covenant of trust, loyalty, prudence, and care. CiServices and its members are committed to reinforcing those principles. The prevailing Code of Conduct is designed with the intent of fostering, honesty, accountability and benchmarking within the organization, and as a guidepost for investors, owner occupiers and strata managers seeking building managers that adhere to sound ethical practice.

The Building Asset Manager Code of Professional Conduct (the “Code”) outlines the ethical and professional responsibilities of building managers that manage Building Assets on behalf of clients. Ethical leadership begins at the highest level of an organization and the Code therefore is adopted by the Manager’s board of directors, senior management, or similar oversight body.

This Code is intended to cover all employees of the firm, as opposed to creating rules that only apply to certain people or groups. By adopting and enforcing a code of conduct, Managers demonstrate their commitment to ethical behavior and the protection of residents interests. In doing so, the Managers also protect the reputation of the firm. The goal of this Code is to set forth a useful framework for all Building Asset managers to provide services in a fair and professional manner and to fully disclose key elements of these services to clients. Managers must adhere to any applicable laws or regulations governing their activities.

Clients have a responsibility to be aware of, understand, and monitor how their Building Assets are managed. But to fulfill this responsibility, clients must be able to count on full and fair disclosure from their Manager. Providing clients with a Code of Ethics that sets a framework for how the Manager conducts its business is an important step in developing the trust and confidence necessary for a successful management management relationship.

A. Loyalty to Clients

MANAGERS MUST:

1. Place client interests before their own.
2. Preserve the confidentiality of information communicated by clients within the scope of the Manager-client relationship. However, as may be required by law, Managers should report any suspected illegal activities to the proper authorities.
3. Refuse to participate in any business relationship or accept any gift that could reasonably be expected to affect their independence, objectivity, or loyalty to clients.

B. Management Process and Actions

MANAGERS MUST:

1. Use reasonable care and prudent judgment when managing client assets.
2. Not engage in practices designed to distort prices or artificially inflate requirements with the intent to mislead participants.
3. Deal fairly and objectively with all clients when providing management information, making management recommendations, or taking management action.
4. Have a reasonable and adequate basis for management decisions and act only after undertaking due diligence to ensure there is sufficient knowledge about specific assets or strategies.
5. When managing a building to a specific mandate, strategy, or style:
 - a. only take management actions that are consistent with the stated objectives and constraints of that building or Strata Plan;
 - b. provide adequate disclosures and information so owners can consider whether any proposed changes in the management style or strategy meet their needs.
6. When managing separate buildings and before providing management advice or taking management action on behalf of the client:
 - a. Evaluate and understand the client's management objectives, tolerance for risk, time horizon, liquidity needs, financial constraints, and any other unique circumstances that would affect management policy and use this information to create a written management Policy Statement that is updated regularly.
 - b. Determine that an investment is suitable to a building's financial situation and consistent with the management Policy Statement for that client.
7. Give priority to management made on behalf of the client over those that benefit their own interests.
8. Maximize client value by seeking best execution for all client transactions.
9. Establish policies to ensure fair and equitable allocation among residents.

C. Compliance and Support

MANAGERS MUST:

1. Develop and maintain policies and procedures to ensure that their activities comply with the provisions of this Code and all applicable legal and regulatory requirements.
2. Appoint a compliance officer responsible for implementing the policies and procedures and investigating any complaints regarding the conduct of the Manager or its personnel.
3. Provide third party verification of p building information to clients to ensure building information is accurate and complete.
4. Maintain records for an appropriate period of time in an easily accessible format.
5. Employ qualified staff and employ adequate human and technological resources to thoroughly investigate, analyze, implement, and monitor management decisions and actions.
6. Establish a business-continuity plan to address disaster recovery or periodic disruptions of the building.

E. Performance and Valuation

MANAGERS MUST:

1. Ensure that performance information is fair, accurate, relevant, timely, and complete. Managers must not misrepresent the performance of individual assets or of their building.
2. Use fair market prices to value client assets and apply, in good faith, methods to determine the value of any asset for which no readily available, independent, third-party market quotation is available.

F. Disclosures

MANAGERS MUST:

1. Provide adequate disclosures to clients on an ongoing and timely basis.
2. Ensure that disclosures are prominent, truthful, accurate, complete, and understandable and are presented in a format that communicates the information effectively.
3. Include any material facts when making disclosures or providing information to clients regarding themselves, their personnel, investments, or the investment process.
4. Disclose the following:
 - a. Conflicts of interests generated by any relationships.
 - b. Regulatory or disciplinary action taken against the Manager or its personnel.
 - c. The management process, including information regarding strategies and risk factors,
 - d. Management fees and other costs charged to owners,
 - e. The performance of assets on a regular and timely basis,
 - f. Valuation methods used to make management decisions and value client holdings.