



## CODE OF ETHICS

To underscore the importance of ethics for our program completers, all Huebner School designees must adhere to The American College of Financial Services' Code of Ethics, which consists of the Professional Pledge and The Canons. A designation may be removed for violations of these standards.

### THE PROFESSIONAL PLEDGE

*"In all my professional relationships, I pledge myself to the following rule of ethical conduct: I shall, in light of all conditions surrounding those I serve, which I shall make every conscientious effort to ascertain and understand, render that service which, in the same circumstances, I would apply to myself."*

### THE CANONS

- I. Conduct yourself at all times with honor and dignity.
- II. Avoid practices that would bring dishonor upon your profession or The American College of Financial Services.
- III. Publicize your achievements in ways that enhance the integrity of your profession.
- IV. Continue your studies throughout your working life so as to maintain a high level of professional experience.
- V. Do your utmost to attain a distinguished record of professional service.
- VI. Support the established institutions and organizations concerned with the integrity of your profession
- VII. Participate in building your profession by encouraging and providing appropriate assistance to qualified persons pursuing professional studies.
- VIII. Comply with all laws and regulations, particularly as they relate to professional and business activities.

### ENFORCEMENT PROCEDURES

The American College's Disciplinary Process for ethical violations can result in the temporary suspension or permanent revocation of a designee's right to use a designation. If a designation is temporarily suspended or revoked, the appropriate adjustment is made to the designation verification database on DesignationCheck.com.

The College's Certification Committee is empowered by the Board of Trustees to ensure compliance with all of the requirements necessary to obtain and continue using the College's designations. The Certification Committee will investigate any complaints and reports of violations, which may originate from a designee's self-disclosure, with state commissioners of insurance, regulatory agencies and other judicial bodies, members of the general public, and industry institutions or organizations. In certain instances, The College itself may initiate action based on apparent violations.

Violations that may cause the Certification Committee to begin an investigation include but are not limited to involvement in a legal proceeding, investigation, suspension or revocation of a license or of membership from another certifying organization, or an allegation of misconduct or ethical violation. The College may choose to impose a disciplinary action even if the individual is found not guilty in the legal proceedings, or if no disciplinary action is taken by any other institution.

Designations may also be revoked, suspended, or placed on inactive status for non-compliance with the Professional Recertification Program. These cases of non-compliance are not considered ethical violations and are not reviewed by the Certification Committee. Designees wishing to reinstate designations that have been revoked or suspended through non-compliance with the Professional Recertification Program should visit <https://www.theamericancollege.edu/sites/default/files/reinstatementpolicy.pdf>.

## **I. INITIATION OF ACTION**

- a. The Registrar of The College makes a preliminary appraisal to determine whether the complaint involves a violation of the Ethics Code and whether there is sufficient evidence for presentation to the Certification Committee.
- b. The Registrar determines the facts of the complaint by gathering evidence and supporting documentation, and examining all the facts that appear relevant to the complaint.
- c. After completing the above steps, the Registrar determines whether to discontinue action or to present the case to the Certification Committee:
  1. If the Registrar determines after its initial review that action should be discontinued, they will then keep a record of the information gathered and document the reasons why the case should be discontinued. No further action will be taken unless new information is received.
  2. If the Registrar determines after its initial review that a case should proceed to the Certification Committee, the Registrar will prepare a case file with all relevant information and will inform the designee in writing of the following within a reasonable period of time:
    - i. details of the matter under investigation;

- ii. time period to be reviewed;
- iii. opportunity for the candidate to respond to the matter under investigation and provide any evidence/documents on their behalf.

## **II. CERTIFICATION COMMITTEE REVIEW**

- a. Membership. The Certification Committee is comprised of a chairperson, usually the College's Compliance Officer, the Registrar, a staff member from The College who is not within Academics, and an independent individual of the general public who holds a College designation. This external position has a term of 12 months. (The College's legal counsel may serve in an advisory role.).
- b. A member of the Certification Committee must recuse themselves from a case if they personally know the designee or any other individuals involved with the case, and if they currently work for or previously worked for the employer or any other institutions named in the case.
- c. The Certification Committee reviews the case and may request additional information. After reviewing the case, the Certification Committee may either dismiss the complaint or decide that the Ethics Code has been violated and impose an appropriate sanction. The decision is conveyed in writing to all parties involved in the complaint, by registered mail and/or email. Sanctions may range from a letter of censure to suspension, deferral, or permanent revocation of a designation. The Certification Committee may impose a revocation only by unanimous vote. Other sanctions may be imposed by majority vote.
- d. A copy of the sanction notice is made a part of The College's permanent records. The College reserves the right to transmit final enforcement decisions to other parties, including but not limited to state licensing boards, employers or affiliated companies of the designee, and other regulatory bodies or governmental agencies. Transmission of the decision to other parties will occur no sooner than 30 days after the final decision has been communicated to the designee.

## **III. APPEALS**

- a. A sanction may be appealed by notifying the Registrar in writing within 30 days of receiving the sanction notice.
- b. When an appeal is received, the Registrar appoints a hearing committee comprised of no fewer than three members who may be Trustees of The College Board but may not be members of The College staff. The members may have no prior connection with the case or with any company with which the appellant has been associated.
- c. The Registrar or a member of the Certification Committee presents the case and may answer questions, but may not participate in the deliberations.

- d. The appellant may present his or her position, call witnesses, and point to the alleged errors in the decision.
- e. If the appellant is represented by counsel, the hearing committee must also be so represented. Counsel to the Committee may be present to clarify issues even if the appellant is not represented.
- f. A recorder who is not a member of the hearing committee keeps minutes of the proceedings.
- g. The hearing committee sets the rules for conduct of the hearing. These rules will be communicated to the Appellant and their counsel (if present) prior to the start of the hearing.
- h. A majority vote based on information provided during the hearing is required and is final and binding on The College and the appellant.
- i. The decision and statement of reasons for the decision is sent by the hearing committee chairperson to The College. The Registrar notifies the appellant and the complainant(s) of the committee's decision by registered mail within 15 days of the hearing.
- j. The College reserves the right to convey the decision to other parties as noted above, and will make adjustments as appropriate to the designee's standing on DesignationCheck.com for the designations covered in that database.