

Code of Ethics

TABLE OF CONTENTS

PREAMBLE AND APPLICABILITY	2
COMPOSITION AND SCOPE	3
COMPLIANCE	3
TERMINOLOGY IN THIS CODE	4
PART I – PRINCIPLES	4
INTRODUCTION	5
Principle 1: Integrity	5
Principle 2: Objectivity	5
Principle 3: Competence	6
Principle 4: Fairness	6
Principle 5: Confidentiality	6
Principle 6: Professionalism	7
Principle 7: Diligence	7
PART II – RULES	7
INTRODUCTION	7
Principle 1: Integrity	8
Principle 2: Objectivity	9
Principle 3: Competence	10
Principle 4: Fairness	10
Principle 5: Confidentiality	12
Principle 6: Professionalism	13
Principle 7: Diligence	15

PREAMBLE AND APPLICABILITY

The Code of Ethics (the “Code”) has been adopted by Can-Am Hockey Family Advisor Inc., and its licensees, contractors, and employees, to provide principles and rules to all persons whom it has recognized and certified to use the association with Hockey Family Advisor, and its logo trademarks (collectively, the “Marks”).

These Marks are owned by Can-Am Hockey Family Advisor Inc. and is the sole organization, which is recognized and authorized to use these Marks.

Implicit in the company’s acceptance of this authorization is an obligation not only to ensure compliance with the mandates and requirements of all applicable laws and regulations, but also to require associated professionals to act in an ethical and professionally responsible manner becoming of the profession.

For purposes of this Code, a person recognized and certified by Can-Am Hockey Family Advisor Inc. to use the Marks is called the HFA Professional. This Code applies to all professionals actively involved in the practice of advisory services while under the auspices of Can-Am Hockey Family Advisor Inc. or in another related profession, in the performance of their professional responsibilities in relation to the clients of Can-Am Hockey Family Advisor Inc., including those of its licensees and contractors.

In addition, some principles, specifically Principle 1 and Principle 6, also apply more generally to the activities of HFA Professionals even when acting outside the scope of their capacity as student-athlete planning practitioners.

COMPOSITION AND SCOPE

The Code consists of two parts: Part 1 – Principles and Part II – Rules.

The Principles are statements expressing in general terms the ethical and professional ideals of HFA Professionals, ideals they should strive to display in their professional activities. As such the Principles are intended to be a source of guidance for our Advisors.

The comments following each Principle further explain the meaning of the Principle. The Rules provide practical guidelines derived from the tenets embodied in the Principles. As such, the Rules set forth the standards of ethical and professional conduct expected to be followed in particular situations. This Code does not undertake to define standards of professional conduct of HFA Professionals for purposes of civil liability.

The Code is structured so that the presentation of the Rules parallels the presentation of the Principles. For example, the Rules which relate to Principle 1 (Integrity) are numbered in the 100 to 199 series while those Rules relating to Principle 2 (Objectivity) are numbered in the 200 to 299 series.

COMPLIANCE

Can-Am Hockey Family Advisor Inc. requires adherence to this Code by all those it recognizes and certifies to use its Marks. Compliance with the Code, individually and by the profession as a whole, depends on each professional's knowledge of and adherence to the Principles and applicable Rules, the influence of fellow professionals and public opinion, and disciplinary proceedings, when necessary, involving HFA Professionals who fail to comply with the applicable provisions of the Code.

TERMINOLOGY IN THIS CODE

“HFA Professional”: a person whose compensation is derived from providing advise and services to a student-athlete client of Can-Am Hockey Family Advisor Inc.

“Conflicts of interest”: circumstances, relationships or other facts about the HFA Professional’s own financial, business, property and/or personal interests that may, as it may appear to a reasonable observer, impair his/her ability to render disinterested advice, recommendations or services.

“Fee-for-service”: a method of compensation where Can-Am Hockey Family Advisor Inc., or the HFA Professional, through agreement, is paid by the student-athlete client for services rendered, or to be rendered.

A “related party” for this purpose shall mean an individual or entity from whom any direct or indirect economic benefit is derived by the HFA Professional as a result of implementing a recommendation made by the HFA Professional.

“Student-athletic Planning”: the process of creating strategies, considering all relevant aspects of a client’s situation, to manage affairs to meet the client’s academic and athletic goals.

PART I – PRINCIPLES

INTRODUCTION

These Principles of the Code recognize the individual advisory professional’s responsibilities to the public, clients, colleagues, employers and to the profession. They apply to all HFA Professionals employed or contracted by Can-Am Hockey Family Advisory Inc. in all aspects of their work, and provide specific guidance to them in the performance of their role.

PRINCIPLE 1: INTEGRITY

A HFA Professional shall always act with integrity.

HFA Professionals may be placed by clients in positions of trust and confidence. The ultimate source of such public trust is the HFA Professional's personal integrity. In deciding what is right and just, a HFA Professional should rely on his or her integrity as the appropriate touchstone. Integrity demands honesty and candor that must not be subordinated to personal gain and advantage. Within the characteristic of integrity, allowance can be made for legitimate difference of opinion; but integrity cannot co-exist with deceit or subordination of one's principles. Integrity requires the HFA Professional to observe not only the letter but also the spirit of this Code.

PRINCIPLE 2: OBJECTIVITY

A HFA Professional shall be objective in providing services to clients. Objectivity requires intellectual honesty and impartiality. It is an essential quality for any professional. Regardless of the particular service rendered or the capacity in which an advisory professional functions, a professional should protect the integrity of his or her work, maintain objectivity, and avoid the subordination of his or her judgment, which would be in violation of this Code.

PRINCIPLE 3: COMPETENCE

A HFA Professional shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the HFA Professional is engaged. One is competent only when one has attained and maintained an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients.

Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation or client referral is appropriate. A HFA Professional, by virtue of having the privilege of association with Can–Am Hockey Family Advisor Inc. is deemed to be qualified to practice student-athlete planning. However, in addition to assimilating the core competencies and knowledge required, and acquiring the necessary experience, a HFA Professional shall make a commitment to continuous learning and professional development.

PRINCIPLE 4: FAIRNESS

A HFA Professional shall perform student-athletic planning in a manner that is fair and reasonable to clients, principals, partners, and employers and shall disclose conflicts of interest in providing such services.

Fairness requires impartiality, intellectual honesty, and disclosure of conflicts of interest. It involves a subordination of one's own feelings, prejudices, and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that one would want to be treated and is an essential trait of any professional.

PRINCIPLE 5: CONFIDENTIALITY

A HFA Professional shall maintain confidentiality of all client information.

A client, by seeking the services of a HFA Professional, expects to develop a relationship of personal trust and confidence. This type of relationship must be built upon the understanding that information supplied to the advisory professional will be confidential. In order to provide student-athlete planning effectively and to protect the client's privacy, the HFA

Professional shall safeguard the confidentiality of such information.

PRINCIPLE 6: PROFESSIONALISM

A HFA Professional's conduct in all matters shall reflect credit upon the profession.

A HFA Professional shall behave in a manner that maintains the good reputation of the profession and its ability to serve the public interest.

A HFA Professional shall avoid activities that adversely affect the quality of his or her student-athlete planning advice.

PRINCIPLE 7: DILIGENCE

A HFA Professional shall act diligently in providing student-athlete planning and promotion.

Diligence is the provision of services in a prompt and thorough manner. Diligence also includes proper planning for and supervision of the rendering of professional services.

PART II – RULES

INTRODUCTION

These Rules provide practical guidelines derived from the tenets embodied in the Principles. As such, the Rules set forth the standards of ethical and professionally responsible conduct expected to be followed in particular situations.

PRINCIPLE 1: INTEGRITY

A HFA Professional shall always act with integrity.

Rule 101 – A HFA Professional shall not engage in or associate with conduct involving dishonesty, fraud, deceit or misrepresentation, or knowingly make a false or misleading statement.

Rule 102 – A HFA Professional has the following responsibilities regarding funds and/or other property of clients:

- a) A HFA Professional who takes custody of all or any part of a client's assets for any purposes, shall do so with the care required of a fiduciary;
- b) In exercising custody of, or discretionary authority over, client funds or other property, a HFA Professional shall act only in accordance with the authority set forth in the set of specific direction;
- c) A HFA Professional shall identify and keep complete records of all funds or other property of a client in the custody, or under the discretionary authority, of the HFA Professional;
- d) Upon receiving funds or other property of a client, a HFA Professional shall promptly or as otherwise permitted by law or provided by agreement with the client, deliver to the client or third party any funds or other property that the client or third party is entitled to receive and, upon request by the client or any person duly authorized, render a full accounting regarding such funds or other property;
- e) A HFA Professional shall not commingle client funds or other property with his/her personal funds and/or other

property or the funds and/or other property of the professional firm.

- f) A HFA Professional shall not use, transfer, withdraw or otherwise employ funds or property for his or her fees, or for any other purpose not provided for in the engagement, except when authorized in writing by the client; and
- g) A client's assets in the custody of the HFA Professional shall be used only for the means intended.

Rule 103 – A HFA Professional shall not solicit clients through false or misleading communications or advertisements, and for greater certainty:

- a) a HFA Professional shall not make a false or misleading communication about the size, scope or areas of competence of the advisory professional's practice or of any organization with which the HFA Professional is associated;
- b) a HFA Professional shall not make false or misleading communications to the public or create unverifiable expectations regarding matters relating to student-athletic planning or competence of the HFA Professional; and
- c) a HFA Professional shall not give the impression that he/she is representing the views of Cam-Am Hockey Family Advisor Inc. or any other group unless he/she has been authorized to do so.

PRINCIPLE 2: OBJECTIVITY

A HFA Professional shall be objective in providing student-athlete planning to clients.

Rule 201 – A HFA Professional shall exercise reasonable and prudent professional judgment in providing student-athlete planning.

Rule 202 – A HFA Professional shall always act in the best interests of the client.

PRINCIPLE 3: COMPETENCE

A HFA Professional shall provide student-athletic planning advice to clients competently and maintain the necessary competence and knowledge to continue to do so in those areas in which the HFA Professional is engaged.

Rule 301 – A HFA Professional shall offer advice only in those areas in which he/she is competent to do so. In areas where the HFA Professional is not sufficiently competent, he/she shall seek the counsel of qualified individuals and/or refer clients to such parties.

Rule 302 – A HFA Professional shall abstain from intervening in the personal affairs of the client on matters outside the scope of the engagement.

PRINCIPLE 4: FAIRNESS

A HFA Professional shall perform student-athlete planning in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall always disclose conflicts of interest in providing such services.

Rule 401 – A HFA Professional shall make timely written disclosure of all material information relative to the professional relationship. Written disclosures that include the following information are considered to be in compliance with this Rule:

- a) A statement indicating whether the HFA Professional's compensation arrangements involve fee-for-service, commission or bonus (which will not be the case under the NCAA Rules), salary, or any combination of the foregoing.
- b) A statement describing the material terms of the relationships that an HFA Professional (or his/her firm) has with third parties, including the nature of the compensation arrangements.
- c) A statement identifying any potential conflicts of interest.

Rule 403 – A HFA Professional shall not receive commissions or other forms of economic benefit from any party other than his/her client (this includes commissions or referral fees from schools, teams, hockey camps, training facilities, etc.). In the case where a HFA Professional is offered such a benefit, he shall; i) immediately disclose all pertinent and material facts to his/her client in writing, and ii) negotiate that the amount of the financial benefit go the client through an agreed method;

Rule 404 – A HFA Professional shall inform the client of changes in circumstances and material information that arise subsequent to the original engagement that may have an impact on the professional relationship or services to be rendered.

Such changes include, but are not limited to:

- a) conflicts of interest;
- b) the HFA Professional business affiliation;
- c) compensation structure affecting the professional services to be rendered; and
- d) new or changed professional relationships.

Rule 405 – A HFA Professional shall not engage in discriminatory practices as defined in applicable human rights legislation.

PRINCIPLE 5: CONFIDENTIALITY

A HFA Professional shall maintain confidentiality of all client information.

Rule 501 – A HFA Professional shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal or regulatory process. A client's name shall not be disclosed to another party unless specific consent has been granted for the use of the client as a reference.

Rule 502 – A HFA Professional is bound to professional secrecy and may not disclose confidential information revealed by reason of his or her position or profession unless required by law.

Rule 503 – The use of client information for personal benefit is improper, whether or not it actually causes harm to the client.

Rule 504 – A HFA Professional shall maintain the same standards of confidentiality for employers as for clients while employed and thereafter.

Rule 505 – A HFA Professional doing business as a partner or principal of Can-Am Hockey Family Advisor Inc., or as a licensee, owes to the firm(s), its advisory professional partners, contractors and/or co-owners a responsibility to act in good faith. This includes, but is not limited to, adherence to reasonable expectations of confidentiality both while in business together and thereafter.

PRINCIPLE 6: PROFESSIONALISM

A HFA Professional's conduct in all matters shall reflect credit upon the profession.

Rule 601 – A HFA Professional shall not engage in any conduct that reflects adversely on his or her integrity or fitness as an HFA Professional, upon the Marks, or upon the profession.

Rule 602 – A HFA Professional shall use the Marks in compliance with the rules and regulations of Can-Am Hockey Family Advisor Inc., as established and amended from time to time.

Rule 603 – A HFA Professional who has knowledge that another affiliated HFA Professional has committed a violation of this Code, which raises substantial questions as to the HFA Professional's honesty, trustworthiness or fitness as an HFA Professional in other respects, shall promptly inform the President of Can-Am Hockey Family Advisor Inc..

This rule does not require disclosure of information or reporting based on knowledge gained as a consultant or expert witness in anticipation of or related to litigation or other dispute resolution mechanisms. For purposes of this rule, knowledge means no substantial doubt.

Rule 604 – A HFA Professional shall not criticize another HFA Professional without first submitting this criticism to the other HFA Professional for explanation. Where the criticism may result in a complaint being lodged with Can-Am Hockey Family Advisor Inc., the HFA Professional must, where required, first submit that criticism in writing to the other HFA Professional for explanation. Notwithstanding this rule, a HFA Professional may first submit a criticism of another HFA Professional to the President of Can-Am Family Advisor Inc., should the matter be considered of such a nature that prior notice is not appropriate.

Rule 605 – A HFA Professional who has knowledge that raises a substantial question of unprofessional, fraudulent or illegal conduct by a HFA Professional or other associated professional, shall promptly inform the appropriate regulatory and/or professional disciplinary body. This rule does not require disclosure or reporting of information gained as a consultant or expert witness in anticipation of, or related to litigation or other dispute resolution mechanisms. For purposes of this Rule, knowledge means no substantial doubt.

Rule 606 – A HFA Professional who has reason to suspect illegal conduct within the HFA Professional organization shall make timely disclosure of the available evidence to the HFA Professional's immediate supervisor and/or partners or co-owners. If the HFA Professional is convinced that illegal conduct exists within the HFA Professional's organization, and that appropriate measures are not taken to remedy the situation, the HFA Professional shall, where appropriate, alert the appropriate regulatory authorities including the President of Can-Am Hockey Family Advisor Inc. in a timely manner.

Rule 607 – A HFA Professional shall perform student-athlete planning in accordance with applicable laws, rules, regulations and established policies of governmental agencies or other applicable authorities, as well as Can-Am Hockey Family Advisor Inc..

Rule 608 – A HFA Professional shall not adopt any method of obtaining or retaining clients that tends to lower the standard of dignity of the profession.

Rule 609 – A HFA Professional shall not practice any other profession or offer to provide such additional services unless the HFA Professional is qualified to practice in those fields and is licensed or registered as required by law.

Rule 610 – A HFA Professional shall return the client’s original records in a timely manner after their return has been requested by the client.

Rule 611 – A HFA Professional shall not bring or threaten to bring a disciplinary proceeding under this Code, or report or threaten to report information to Can-Am Hockey Family Advisor Inc. pursuant to Rules 602 or 603 or make or threaten to make use of this Code for no substantial purpose other than to harass, maliciously injure, embarrass and/or unfairly burden another HFA Professional.

PRINCIPLE 7: DILIGENCE

A HFA Professional shall act diligently in providing student-athletic planning.

Rule 701 – A HFA Professional shall enter into a client engagement only after securing sufficient information to be satisfied that the relationship is warranted by the individual’s needs and objectives, and that the HFA Professional has the ability to either provide the requisite competent services or to involve and supervise other professionals who can provide such services.

Rule 702 – A HFA Professional shall make only those recommendations that are suitable for the client.

Rule 703 – Consistent with the nature and scope of the engagement, a HFA Professional shall carry out a reasonable investigation regarding the opportunities recommended to clients.

Such an investigation may be made by the HFA Professional or by others provided the HFA Professional acts reasonably in relying upon such investigation.

Rule 704 – A HFA Professional shall properly supervise subordinates with regard to their delivery of student-athletic planning, and shall not accept or condone conduct in violation of this Code.

For additional information, please contact;

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