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SANTA FE  
ASSOCIATES  
INTERNATIONAL

**CODE OF CONDUCT**

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# SANTA FE ASSOCIATES INTERNATIONAL

## CODE OF CONDUCT

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## DECLARATION OF SANTA FE

At the time of being admitted as a member of SANTA FE ASSOCIATES INTERNATIONAL

- We solemnly pledge to consecrate our profesional life to the service of humanity as a guarantor of truth,
- We will give to my teachers the respect and gratitude that is their due;
- We will practice our profession with conscience and dignity,
- We will respect the secrets that are confided in us,
- We will maintain by all the means in our power, the honour and the noble traditions of the accounting profession,
- Our colleagues will be our sisters and brothers,
- We will not permit considerations of age, disease or disability, creed, ethnic origin, gender, nationality, political affiliation, race, sexual orientation, social standing or any other factor to intervene between our duty and our client,
- We will not use our professional knowledge to violate human rights and civil liberties, even under threat,
- We make these promises solemnly and freely

## 1. RECITALS

1.1. As A SANTA FE ASSOCIATES INTERNATIONAL member firm we declare

1.1.1. We are aware of the following Code of Conduct issued by and to be implemented within SANTA FE ASSOCIATES

1.1.2. We have completely understood its content

1.1.3. We formally declare that we implement this Code content in all our professional work

1.1.4. We have taken the responsibility to distribute the present Code to all our staff

1.1.5. We have received written notification from all our staff of his acceptance and mandatory implementation.

## 2. REGULATORY COMPLIANCE

2.1. We are aware of IFAC [International Federation of Accountants] Code of Ethics as well as IMC [Institute of Management Consultants] Code of Ethics and we follow their standards

2.2. We obey the laws and regulations that govern the global management of SANTA FE ASSOCIATES business.

2.3. We are responsible for understanding these laws and regulations as they apply to our jobs and for preventing, detecting, and reporting instances of non-compliance to the Executive Board

### 3. CLIENT ACTIVITIES

- 3.1. We serve our clients with integrity, competence, independence, objectivity, and professionalism.
- 3.2. We shall mutually establish our clients realistic expectations of the benefits and results of services rendered
- 3.3. We shall only accept assignments for which our firm possess the requisite experience and competence to perform
- 3.4. We shall agree in advance with a client on the basis for fees and expenses and will charge fees that are reasonable and commensurate with the services delivered and the responsibility accepted.
- 3.5. We shall not accept commissions, remuneration, or other benefits from a third party in connection with the recommendations to a client without that client's prior knowledge and consent, and we shall disclose in advance any financial interests in goods or services that form part of such recommendations
- 3.6. We shall sub-contract works only with the prior agreement of the client, and except where otherwise agreed, will remain responsible for the performance of the work

**4. REGULATORY INVESTIGATIONS, INSPECTIONS AND ENQUIRES**

4.1. We are direct, honest, and truthful in our discussions with regulatory agency representatives and government officials.

4.2. During investigations, inspections, and inquiries we work with local managing partners and SANTA FE ASSOCIATES INTERNATIONAL board members and we cooperate by responding to appropriate requests for information

**5. INTERNATIONAL BUSINESS ACTIVITY**

5.1. SANTA FE ASSOCIATES INTERNATIONAL acknowledges and respects the diverse cultures, customs, and business practices it encounters in the international marketplace

5.2. SANTA FE ASSOCIATES INTERNATIONAL partners will comply with both the applicable international laws and regulations that govern its operations and local laws wherever it does business.

**6. ANTI CORRUPTION**

6.1. SANTA FE ASSOCIATES INTERNATIONAL prohibits corruption of government officials as well as private executives and the payments of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

6.2. Partners are committed to observing the standards of conduct set forth by the international laws and the applicable anti-corruption and anti-money laundering laws of the countries in which we operate

## **7. FAIR COMPETITION**

7.1. As a global business unit, we encounter laws and regulations designed to promote fair competition and encourage ethical and legal behavior among competitors. We follow those regulations

## **8. RESPONSBLE LEADERSHIP**

8.1. We manage our business responsibly in order to maintain the confidence, respect, and trust of our customers, clients, partners, shareholders, and our fellow partners within SANTA FE ASSOCIATES and other audiences.

8.2. We are committed to acting with integrity, investing in new product development, being responsive and accountable to our clients and partners, and remaining a leader in our field.

## **9. PRODUCT AND SERVICE QUALITY**

9.1. SANTA FE ASSOCIATES INTERNATIONAL professional activity is developed and managed to meet the expectations of our customers, clients, and partners for high quality and exceptional service.

9.2. We continue investing our best efforts as to improve our products, service, and responsiveness.

## 10. CONFIDENTIAL AND PROPRIETARY INFORMATION

- 10.1. We respect our ethical and legal responsibilities to protect SANTA FE ASSOCIATES INTERNATIONAL confidential and proprietary non-public information and communicate it only as necessary to conduct our business.
- 10.2. We do not use this information for our personal advantage or for non SANTA FE ASSOCIATES INTERNATIONAL business use, and maintain this confidentiality even after we could leave the organization
- 10.3. We shall treat appropriately all confidential client information that is not public knowledge, take reasonable steps to prevent it from access by unauthorized people, and will not take advantage of proprietary or privileged information, either for use by our firm, the client's firm, or another client, without the client's permission

## 11. UNITED NATIONS GLOBAL COMPACT

- 11.1. We are aware that SANTA FE ASSOCIATES INTERNATIONAL has committed as an international organization to support the UN Global Compact working to help to transform our world, aiming to create a sustainable and inclusive global economy that delivers lasting benefits to all people, communities and markets.
- 11.2. As a voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN goals we adhere to those principles and support those goals through our participation.



- 11.3. We are aware of the UN Global Compact's Ten Principles that are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.
- 1.3.1. Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights
- 2.3.2. Principle 2: Make sure that they are not complicit in human rights abuses.
- 3.3.3. Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4.3.4. Principle 4: the elimination of all forms of forced and compulsory labour;
- 5.3.5. Principle 5: the effective abolition of child labour;
- 6.3.6. Principle 6: the elimination of discrimination in respect of employment and occupation.
- 7.3.7. Principle 7: Businesses should support a precautionary approach to environmental challenges;
- 8.3.8. Principle 8: Undertake initiatives to promote greater environmental responsibility;
- 9.3.9. Principle 9: Encourage the development and diffusion of environmentally friendly technologies.
- 10.3.10. Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.
- 11.3.11. And we are involved and committed to those principles support those principles and to work with the international organisation to get those above mentioned goals. The use publicly of UN GLOBAL COMPACT logo, commit every firm to apply those principles.



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