WILLOW

WILLOW'S PRINCIPLES OF CONDUCT

As a Willow Certificate Holder, in accordance with the Willow Principles of Conduct, I acknowledge and agree to fulfill my ethical, professional and legal obligations to my Clients, firm, colleagues and to the public at large. If I breach any part of the Principles of Conduct, I agree that Willow in its sole discretion may hold me accountable. I further agree that my accountability to Willow for any breach may include sanctions, such as mandatory additional training or other education, or loss of my status as a Certificate Holder.

I. **Integrity**
   A. All representations made of you to clients and prospects are accurate and realistic. You avoid misleading statements on your Advisor Profile, your website, and in conversations
   B. Recognize the intellectual property of Willow certificate materials and seminar evaluations and work to maintain the integrity of all certificate materials
   C. Following through on certificate requirements that provide attestations from real people who hold the positions you indicate (peer, client, etc.)
   D. Practice within the scope of your competence
   E. Commit to excellence through continued personal, professional and ethical development
   F. Use reasonable care and judgment to achieve and maintain independence and objectivity in their professional activities
   G. Provide fair and equal treatment to people of all cultures and life experience
   H. Represent the financial industry favorably by adding value to each relationship, including both clients and prospects

II. **Fiduciary Requirements**
   A. Providing a fiduciary standard of care that prioritizes the benefit of the client and includes loyalty, good faith, confidentiality, prudence, and disclosure
   B. Knowing clients as people beyond the numbers
   C. Maintain professionalism

III. **Communication**
   A. Takes place with regularity
   B. Includes the elements of financial wellness: practical, emotional, spiritual
   C. Acknowledge the need for empathy
   D. Usage of trademarks
      1. Requires ™ symbol in all correspondence
      2. Can not be used in conjunction with a company name as they only apply to an individual designee
   E. Manage disclosure of actual or potential conflicts of interest through agreements and dialogue with Willow (email: members@trustwillow.com)
   F. Maintain confidentiality by protecting clients' sensitive information including emotions and opinions
   G. Strive for clarity and simplicity with clients. Avoid financial jargon
   H. Have a clear understanding about how information is exchanged among all parties involved

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WILLOW'S ATTESTATION OF ETHICAL CONDUCT

I certify that my answers below are accurate, truthful, and complete. I also agree to notify Willow via email (members@trustwillow.com) promptly of any changes that would require a different response to any of the following questions.

I certify that i am not and have never been:

A. The subject of any written **complaint** or accusation regarding your professional conduct or activities?
B. The subject of any **investigation** (internal or external) in which your professional conduct or activities were questioned or at issue?
C. The subject of, or a defendant or respondent in, any **litigation**, arbitration, or other action or proceeding in which your professional conduct or activities were questioned or at issue?
D. Reprimanded, censured, restricted, suspended, barred, enjoined, or otherwise sanctioned by any regulator, professional organization, government agency, or court because of your professional conduct or activities?
E. Accused of, been convicted of, or pleaded guilty to, any **crime** relating to your professional conduct or activities?
F. Accused of, been convicted of, or pleaded guilty to, any **crime** (regardless of whether it involved your professional conduct or activities) that could have resulted in a sentence of more than one year in prison?
G. The subject of a **FINRA Rule 4530** report which requires firms to promptly report specific events of reportable conduct, including, for example, violations of securities laws and FINRA rules, certain written customer complaints and certain disciplinary actions taken by the firm?