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**Instituto de Actuarios
de España**

CODE OF PROFESSIONAL CONDUCT

Common Principles of Ethical and Professional Behaviour accepted by the Instituto de Actuarios de España as full member of the Actuarial Association of Europe.

Adopted by the General Assembly of the Actuarial Association of Europe on September 26th 2025, and by the General Assembly of the Instituto de Actuarios de España on June 15th 2026.

Effective from: January 1st 2027

Code of Professional Conduct

Section 1. General

1.1. Purpose

- 1.1.1. This Code of Professional Conduct ("Code") provides guidance on the behaviours expected of actuaries when performing professional services, to give intended users of those services confidence that they are carried out professionally and with due care.
- 1.1.2. The Code also provides guidance on the behaviours expected of actuaries in wider contexts, as described in Section 1.2, Application.

1.2. Application

1.2.1. Regarding the Principles set out in Section 3:

- (a) All actuaries are expected to comply with Principle A (Integrity) in the performance of their work and in other contexts where their conduct could reasonably be considered to reflect on the actuarial profession.

Professional services

- (b) All actuaries are expected to comply with Principles B – E (Competence and Care; Compliance; Impartiality; Communication) in relation to professional services that they perform (whether on a paid or unpaid basis).

Other work

- (c) In relation to work performed other than professional services (if any, and whether on a paid or unpaid basis), actuaries should exercise professional judgement to determine whether and, if so, to what extent it is appropriate to comply with the spirit and intent of Principles B – E (Competence and Care; Compliance; Impartiality; Communication), taking into account the reasonable expectations of the intended user(s) of the work, the nature of the work, any other Code or standards that apply to the work and any other relevant factors.

Support roles

- (d) It is recognised that actuaries might act in a support role in which another person carries ultimate responsibility for the work performed. For the avoidance of doubt, actuaries in support roles are expected to comply with the Code (as per paragraph 1.2.1 (a), (b) and (c)), though it is reasonable to expect that any assessment of their conduct by reference to the Code would have regard to such factors as their level of responsibility in relation to the matter and the extent of their relevant work experience.

Observing the spirit and intent of the Code

(e) The Code is not an all-encompassing description of behaviours that should be adopted or avoided. Actuaries are expected to observe the spirit and intent of the Code, rather than interpret it only in a purely literal way.

1.2.2. For the purposes of this Code:

(a) “must” means that the indicated action is mandatory and failure to follow the indicated action will constitute a departure from this Code; and

(b) “should” means that, under normal circumstances, the actuary is expected to follow the indicated action, unless to do so would produce a result or outcome that would be inappropriate or potentially misleading. If, in the performance of professional services, the indicated action is not followed, the actuary should disclose that fact to the intended user(s) of the professional services and provide the reason for not following the indicated action.

1.2.3. Nothing in this Code is intended to require an actuary to act in breach of legal or regulatory requirements. If there is an inconsistency between this Code and legal and/or regulatory requirements, the legal and/or regulatory requirements shall prevail. “Legal requirements” here does not extend to the provisions of agreed contracts.

Section 2. Definitions

The terms below are defined for use in this Code.

2.1. Actuary: A Qualifying Actuary¹ of the Instituto de Actuarios de España.

2.2. Intended User: Any legal or natural person (usually including the principal) for whose use the actuary provides the results of professional services.

2.3. Principal: The party who engages the provider of professional services. The principal will usually be the client or the employer of the actuary.

2.4. Professional judgement: The judgement of the actuary, based on actuarial (or other relevant) training and experience.

2.5. Professional services:

- All services provided by an actuary that relate to a pension scheme/fund, insurance/reinsurance/financial services entity or financial transactions; and
- All other services provided by an actuary that are based upon actuarial considerations.

Section 3. Principles

A. Integrity

¹ Members of Full Member Associations which are to be regarded as qualifying for mutual recognition under this Agreement are referred to as “Qualifying Actuaries”.

An actuary must act honestly and with the highest standards of integrity.

B. Competence and Care

An actuary must perform professional services competently and with care.

C. Compliance

An actuary must comply with all relevant legal, regulatory and professional requirements.

D. Impartiality

An actuary must not allow bias, conflict of interest or the undue influence of others to override professional judgement.

E. Communication

An actuary must communicate in an appropriate manner and meet all applicable reporting standards.

Section 4. Amplification of Principles

The following information, which forms part of the Code, is included in order to elaborate on how (subject to paragraph 1.2.1) actuaries are expected to interpret and apply the principles.

This information is not exhaustive. Actuaries are expected to apply professional judgement as and when necessary to ensure that they observe the spirit and intent of the Code, rather than interpret it only in a purely literal way.

A. Integrity

A1 - An actuary must perform work with integrity, skill and care and (subject always to any relevant legal, regulatory and professional requirements) should fulfil the actuary's responsibility to the principal.

A2 - An actuary should not act in a manner that is likely to damage the reputation of the actuarial profession, whether in the performance of work or in other contexts in which conduct could reasonably be considered to reflect on the actuarial profession.

A3 - An actuary must not provide, or knowingly be associated with the provision of, information, nor engage in advertising or business solicitation, that the actuary knows or ought to know is materially false or misleading, contains statements or information furnished recklessly or omits or obscures information required to be included and as a result is materially misleading. If an actuary becomes aware that the actuary has been associated with such information, the actuary should take steps to be disassociated from the information. This provision does not preclude an actuary from performing work based on:

- assumptions or methodology prescribed by the principal or another party, provided that, if the actuary does not support the assumptions or methodology, the actuary discloses that fact to the intended user; or

- assumptions or methodology prescribed under legal, regulatory or professional requirements.

A4 - An actuary should show respect for others and should cooperate with those serving the actuary's principal.

A5 - Subject to any legal, regulatory or professional reporting obligations, an actuary must respect the confidentiality of confidential information received.

A6 - When an actuary is asked to perform work previously performed by another person, the actuary must consider whether it is appropriate to consult with the previous provider to establish whether there might be any professional reason not to take on the new responsibility.

A7 - Subject to any applicable legal, regulatory, or professional requirements, an actuary should take reasonable steps, depending on the facts and circumstances, to ensure that relevant stakeholders, primarily their employer or client, are aware of any unethical, unlawful, and/or non-compliant behaviour that the actuary becomes aware of in the course of their professional work.

B. Competence and Care

B1 - An actuary should perform professional services carefully, thoroughly and in a timely manner.

B2 - An actuary must perform specific professional services only if:

- the actuary is competent and appropriately experienced to do so, or
- the actuary is acting on the advice of an individual who has the appropriate level of relevant knowledge and skill and the principal is aware that this is the case, or
- the actuary is acting under the direct supervision of another person who is taking professional responsibility for the work.

B3 - Before communicating the results of professional services performed, the actuary should ensure that, to the best of the actuary's knowledge and reasonably held belief, the results are free from material error.

B4 - An actuary should agree with the principal the nature and scope of the actuary's responsibilities before commencing delivery of professional services.

B5 - An actuary should assess if input from other professionals or specialists is required to ensure the relevance and quality of their work.

C. Compliance

C1 - An actuary must act in a manner that fulfils the actuarial profession's responsibility to the public by observing applicable legal, regulatory, technical and professional requirements and standards. An actuary must take into account any relevant codes,

standards, guidance notes and similar documents formally issued or endorsed by the actuarial association(s) of which the actuary is a member, having regard to their scope and status (for example mandatory, recommended practice, etc).

C2 - An actuary is subject to the disciplinary procedures prescribed in the rules of the actuarial association(s) of which the actuary is a member, and, subject to the right of appeal within those rules, must accept any judgement passed, or the decision of any appeal procedure.

D. Impartiality

D1 - An actuary must not perform professional services involving an actual or potential conflict of interest or involving bias or perceived bias on the part of the actuary, unless the actuary's ability to act in an impartial manner is unimpaired and there has been full disclosure to the principal of the actual or potential conflict or bias.

D2 - An actuary should disclose to the principal, in writing and in a timely manner, all sources of income related to any assignment carried out for the principal (except that, where the principal is the actuary's employer, there is no requirement to disclose remuneration paid by the employer).

E. Communication

E1 - An actuary must communicate the results of professional services in a timely manner and in a style and format that is appropriate to the particular circumstances, having regard to the need to convey the implications of any analysis and advice included in the communication in a manner that is comprehensible and not misleading to the intended user(s).

E2 - Unless the actuary judges it disproportionate (in which event, departure from these requirements does not create a requirement for disclosure under paragraph 1.2.2 (b)), an actuary should, in communicating the results of professional services:

- identify that the actuary is the source of the communication;
- identify that the actuary takes responsibility for the results, subject (if applicable) to any stated caveats;
- state the capacity in which the actuary is acting;
- identify the intended user(s) of any analysis and advice included in the communication;
- state the scope and purpose of the work; and
- indicate to what extent and how supplementary information and explanation can be obtained from the actuary or another party.