

MEMO# 12994

January 9, 2001

DRAFT OF INSTITUTE DRAFTING GUIDE FOR CODES OF ETHICS

[12994] January 9, 2001 TO: COMPLIANCE ADVISORY COMMITTEE No. 1-01 SEC RULES COMMITTEE No. 1-01 RE: DRAFT OF INSTITUTE DRAFTING GUIDE FOR CODES OF ETHICS As you may know, the Institute in the past has prepared a Drafting Guide for Codes of Ethics in order to provide a framework under which members can develop their own codes of ethics. The existing version of this document (which is included in the Institute's Investment Advisers Guide) was published in 1993. We have undertaken to revise the Drafting Guide, with the assistance of a member working group, to incorporate the recommendations contained in the 1994 Report of the Advisory Group on Personal Investing as well as the 1999 amendments to Rule 17j-1. A draft of the revised Drafting Guide is attached for your review. Please provide any comments on the Drafting Guide to me by Thursday, January 25. You can reach me by e-mail at kireland@ici.org, by fax at (202) 326-5827, or by phone at (202) 371-5432. Kathy D. Ireland Associate Counsel Attachment Attachment (in .pdf format)

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