
	<p>POLICY:  <b>Policy on the Prevention of Conflict of Interest</b>  K4- Publicly available information</p>	
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**Edition valid since: 25.06.2019**


## **Policy on the Prevention of Conflict of Interest**

### **1. Terms, abbreviations**

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|--|---|
| <b>1.1. Benefits</b>                   | Non-financial inducement;   |
| <b>1.2. Client</b>                     | Legal entity or natural person, who has entered into an Agreement with the Company;   |
| <b>1.3. Company</b>                    | AS IBS „Renesource Capital“;  |
| <b>1.4. Conflict of interest</b>       | Circumstances in which several persons are in a position to derive personal benefit from actions or decisions made in their official capacity, when providing Investment Services. These circumstances may arise between Group entities, and employees of the Company, persons having direct or indirect control over the Company, between the Client and a Relevant person as well as between Clients of the Company;  |
| <b>1.5. Contract</b>                   | Contract on rendering of investment services concluded between Company and Client;  |
| <b>1.6. Employee</b>                   | Natural person, who has valid labour contract with the Company;   |
| <b>1.7. FCMC</b>                       | Financial and Capital Markets Commission of Republic of Latvia;   |
| <b>1.8. Financial instruments (FI)</b> | Financial instruments, as defined in the “Law on the Financial Instruments Market” of the Republic of Latvia. Definition is applied to the investment products mentioned in the 2018.28.08 FCMC “Rules on investment products management requirements”;   |
| <b>1.9. Inducements</b>                | Fees, commission fees, other monetary and non-monetary benefits, which the Company is paying or being paid or providing or being provided from the third parties in connection with the provision of Investment services to the Clients (including inducements received from the person acting on behalf of the third person);  |
| <b>1.10. Investment advice</b>         | The provision of a personal recommendation upon the Client’s request or by Company on its’ own initiative with respect to one or several transactions with the FI;  |
| <b>1.11. Investment research</b>       | Within the meaning of this Policy, research or other information by which an investment strategy is recommended or suggested directly or indirectly with respect to one or more FI or issuers of FI, including any opinion on the current or future value or future price of such FI, and which is envisaged for the distribution channels or the general public, and with respect to which the following conditions have been fulfilled: <ul style="list-style-type: none"> <li><b>(i)</b> it is designated as an Investment research or otherwise reflected as an impartial or independent explanation of the matters included in the research;</li> <li><b>(ii)</b> it is not a recommendation given to the Client in course of providing Investment advice</li> </ul> |

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- 1.12. Investment services** The Scope of investment services and ancillary investment services as defined in the Law on the Financial Instruments Market, which are provided by the Company.
- 1.13. Investment Policy** The mandatory rules of the Portfolio Management, consisting of description asset placement including but not limited to FI, investment horizon, area, terms, currency, limitations and other provisions.
- 1.14. LR** Republic of Latvia
- 1.15. Personal Transaction** Transaction with FI effected by or on in favour of the Relevant person, where at least one of the following criteria is met:
- (a) the transaction is carried out outside the scope of the activities of the Relevant person which are carried out in his/her professional capacity;
  - (b) the transaction is carried out for the account of the Relevant person;
  - (c) the transaction is carried out for the account of the spouse, dependent children of the Relevant person or other relatives or any other persons, who have close relations with the Relevant person or have shared the household with the Relevant person for at least one year;
  - (d) the transaction is carried out for the account of a person in respect of whom the Relevant person has a direct or indirect material interest in the outcome of the transaction, other than obtaining a fee or commission for the execution of the transaction;
- 1.16. Policy** This “Policy on the Prevention of Conflict of Interest”;
- 1.17. Portfolio** Assets of the Client being under Portfolio management and consisted of FI, monetary funds and receiving/income generated from Portfolio management and/or by FI;
- 1.18. Portfolio management** Investment service consisting of managing portfolios in accordance with mandates given by Clients on a discretionary client-by-client basis where such portfolios include one or more FI; Employee who is duty for Portfolio management;
- 1.19. Portfolio manager**
- 1.20. Relevant person in relation to the Company (Relevant person):**
- (a) The Chairman, a member of the Company’s Management Board or the Supervisory Board or other person, who on behalf of Company entity takes significant decisions, creates civil obligations thereto;
  - (b) An employee of the Company as well as any other natural person, whose services are placed at the disposal and under the control of Company and who is involved in the provision of Investment services and activities by the Company;
  - (c) A private individual who is directly involved in the provision of services to the Company under an

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### 1.21. Tied agent

outsourcing arrangement for the purpose of the provision by Company of Investment services  
a natural or legal person who, promotes Investment services to Clients or prospective Clients, receives and transmits instructions or orders from the Client in respect of Investment services or FI, places FI or provides Investment advice to Clients or prospective Clients in respect of those FI or service

## 2. Purpose

**2.1.** The Policy has been developed in line with the requirements of the Law on the Financial Instruments Market of the Republic of Latvia, Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU and Delegated Regulations. The objective of the Policy is as follows:

- (a) to ensure the protection of interests of the Clients providing Investment services;
- (b) to determine the core principles and elements in order to take the necessary measures for identification of circumstances which cause or may cause a Conflict of interest, creating a significant threat or injury to the interests of one or several Clients;
- (c) to prevent or diminish Conflict of interest and their adverse effects, which may arise in the course of providing Investment services;
- (d) to determine the liabilities and obligations of the Company's management and employees when managing Conflict of interest.

## 3. General provisions and Main principles of the Policy

**3.1.** Company is aware, that involvement of the different departments into rendering of the different investment services may result in conflict of interest between Clients, Relevant persons, Tied agents:

- 3.1.1.** Order execution;
- 3.1.2.** Custody of the Assets;
- 3.1.3.** Portfolio management;
- 3.1.4.** Investment advice;
- 3.1.5.** Corporate investment banking services;

**3.2.** Before involvement into rendering of services (**clause 3.1.**), the Company made sure that it has hierarchal separation of all duties and that Conflict of interest is controlled in accordance with the Policy and others internal rules.


**3.3.** Company ensures that the same Employee is performing only one duty from the specified below:

- 3.3.1.** Receiving and execution or receiving and transmitting for execution of Client's orders;
- 3.3.2.** Portfolio management and related to it execution of transmitting for execution;

**3.4.** The Policy regulates the prevention and management of Conflict of interest arising in the course of providing Investment services.

**3.5.** The prevention and management of Conflict of interest is performed in view of the following core principles:


- (a) assessment of the risk of damage to the interests of Clients;
- (b) determination of restrictions on the execution of Personal transactions;

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- (c) keeping and maintaining the register of Personal transactions;
  - (d) supervision of Relevant persons, whose principal functions involve carrying out activities on behalf of Clients, or providing Investment services to Clients;
  - (e) monitoring and management of circumstances, which constitute or may give rise to a Conflict of interest;
- 3.6. The Company implementing the provisions of the Policy takes into account the scope of Investment services it provides in light of their specific characteristics and features.
- 3.7. Employees observe high ethical standards in the performing of their duties.
- 3.8. Company ensures the avoidance of the Conflict of interest among Employees involved into different activities, related to the direct link between activity and remuneration of the Employee.
- 3.9. Company may draw up internal regulations for the purpose of production, dissemination and record keeping of marketing communication.
- 3.10. Company may draw up and make publicly available reports and other documents containing information about prevention and management of circumstances, which constitute or may give rise to a Conflict of interest.
- 3.11. To ensure the fair and honest treatment of the Clients and the quality of the Investment services Employees observe Client's interests, as well as non-discriminatory attitude to them.

#### 4. Identifying the types of Conflict of interest

- 4.1. Conflict of interest may arise in the course of providing Investment services by the Company between:
- (a) employee and a Client;
  - (b) an individual, who has direct or indirect control under any of the Company, and/or a Client;
  - (c) Clients of the Company;
  - (d) Client and a Relevant person;
  - (e) a Relevant person and a Company;
  - (f) Tied agent and Company and/or Client;
- 4.2. The circumstances which constitute or may give rise to a Conflict of interest between persons under **Clause 4.1** of this Policy are the following:
- (a) an execution of FI orders on behalf of more than one Client at the same time;
  - (b) Employee executes, or is planning to execute, a transaction with FI at the same time as a Client submits or executes a transaction in relation to the same FI;
  - (c) an execution of orders related to FI distributed by the Company;
  - (d) The Company is interested in the increasing of revenues from Portfolio management, as well as increasing of the Portfolio value in result of the sale/purchase of FI issued by the Company;
  - (e) Execution of the limit order in respect of FI;
  - (f) Company simultaneously performs Portfolio management of two or more Portfolios and makes investment decision in respect of them;
  - (g) the Company paying or being paid any fee or commission or providing or being provided with Inducement from third parties in connection with the provision of Investment services to the Clients;


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- (h) an Employee or a Relevant person accessing inside information about the financial position of a Client or another inside information, which can impact the value of FI the Client holds;
- (i) an Employee or a Relevant person has access to inside information about the executed/planned transactions of the Client;
- (j) in the course of providing Investment services to the Clients, a Company takes into consideration the circumstances when a Relevant person:
  - (I) is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
  - (II) has an interest in the outcome of an Investment service provided to the Client or of a transaction carried out on behalf of the Client, which is distinct from the Client's interest in that outcome;
  - (III) has a financial or other incentive to favour the interest of another Client or group of Clients;
  - (IV) carries out the same business as the Client;
  - (V) receives or will receive from a person other than the Client an Inducement in relation to an Investment service provided to the Client, in the form of monetary or non-monetary benefits or services.
- (k) The Company offers the FI mentioned below to the Clients and/or Relevant persons or the Clients and/or Relevant persons that already holds the FI:
  - (I) of those issuers, to whom a Company provided a service of placement and underwriting, or assisted in performing this placement and underwriting to the third persons;
  - (II) The Company provides liquidity to / acts as a market maker for;
  - (III) The Company provided an Investment advice;
  - (IV) for which a Company entered into a distribution agreement and, especially if Company receives Inducement for distribution of;
  - (V) of the issuer, which is a Client of any Company.

## 5. Measures to prevent circumstances of the Conflict of interest

### 5.1. General provisions

- 5.1.1. A Company in line with its size and organization as well as the nature, scale and complexity of its business establishes, implements and maintains necessary measures to identify and manage circumstances which constitute or may give rise to a Conflict of interest in the course of Investment services provision to its Clients.
- 5.1.2. By establishing the procedures and measures for the prevention of Conflict of interest, a Company shall ensure that they are proportionate to the damage to the interest of the Clients.
- 5.1.3. Company ensures that all Employees involved into rendering of the Investment services has necessary knowledges to it.
- 5.1.4. A Company establishes an internal organizational structure, which maximally diminishes the probability of Conflict of interest arising. The units conducting activity, which may give rise to a Conflict of interest, are mutually independent. The employees of a Company providing

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Investment services or manufacturing FI possess the necessary knowledge and competence to fulfil their obligations.

- 5.1.5.** A Company prevents the exchange of information about Investment services provided to the Clients between employees and Relevant persons if such information may harm the interests of one or more Clients.
- 5.1.6.** If a Company is offering FI issued by itself to its own Clients and is unable to manage in appropriate manner the Conflict of interest that arises in relation to this type of activity, the Company considers refraining from engaging in this activity in order to prevent any adverse effect on its Clients.
- 5.1.7.** If a Company in the course of providing Investment services to its Clients distributes or recommends FI, which is not manufactured by itself, it shall obtain from the manufacturer the information to gain the necessary understanding and knowledge of the FI it intends to distribute or recommend in order to ensure that this FI will be distributed in accordance with the needs, characteristics and objectives of the identified target market. If required the Company shall draw up necessary arrangements which regulate FI distribution.

**5.2. Measures to prevent and manage Conflict of interest by executing Client orders for FI trading**


- 5.2.1.** Client orders are executed in line with the “Order execution policy” of the Company.
- 5.2.2.** A Company ensures separate supervision of a Relevant person, whose principal functions involve carrying out activities on behalf of the Client or providing Investment services to the Client or who represents different interests (interest of Company included), which may conflict with the interests of the Client.
- 5.2.3.** A Company removes any direct link between the remuneration and income gained by a Relevant person, who is engaged in the Investment services provision through receiving, processing and executing Client’s orders.
- 5.2.4.** A Company prohibits a Relevant person to give any recommendations in respect of trading with FI issued by the Company.
- 5.2.5.** A Company ensures separate rules for executing limit orders given at the initiative of the Client in respect of debt securities.

**5.3. Measures to prevent and manage Conflict of interest when providing custody services**

- 5.3.1.** Company in its records accounts the FI belonging to its Clients in the name of the respective Client and separately from its own FI.
- 5.3.2.** Company ensures that the FI of the Client is identifiable separately from the FI owned by other Clients and from the FI owned by the Company.

**5.4. Measures to prevent and manage Conflict of interest when providing Portfolio management**

- 5.4.1.** A Company removes any direct link between remuneration of employees and revenues generated by the Investment portfolio of the Client.

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**5.4.2.** In cases where a Company providing Portfolio management intends to include in the Client portfolio FI issued by itself or another Company, Clients shall be informed thereof, as well as of risk related to this FI and about other possible investment alternative.

**5.5. *Measures to prevent and manage Conflict of interest when producing Investment research***

**5.5.1.** Company does not produce Investment research.

**5.5.2.** A Company may receive Investment research produced by the third party in return of direct payments by Company out of its own resources. This Investment research may be used only for the purposes of Company and shall not be published or disseminated to Clients

**5.6. *Limitations in relation of Personal Transactions***


**5.6.1.** A Company ensures measures for Personal transactions monitoring and if required prescribes restrictions and limitations on undertaking Personal transactions.

**5.6.2.** A Relevant person is prohibited from the following:

- (a) undertaking a Personal transaction on the basis of inside information of a Company it may possess as a result of job or professional duties within a Company;
- (b) undertaking a Personal transaction by using or inappropriately disclosing confidential information;
- (c) undertaking a Personal transaction, which conflicts or is likely to conflict with the LR legislation or with internal rules of a Company;
- (d) advising a third party to make a transaction in FI that would be a Personal transaction of the advising person to which the following restrictions apply (except where a transaction has been made by performing job or professional duties):
  - (I) the transaction is undertaken on the basis of inside information of a Company a Relevant person may possess as a result of job or professional duties or on the basis of misuse or improper disclosure of that confidential information;
  - (II) the transaction conflicts with the LR legislation or with internal rules of a Company;
  - (III) the transaction is undertaken on the basis of misuse information about unexecuted or pending Client orders;
- (e) disclose information to a third party or express an opinion where the person disclosing information knows or ought to have known that as a result of the disclosed information the third party will make or is likely to make or advise another person to make a transaction in FI that would qualify as a Personal transaction to the person disclosing information and to which the restrictions set out in the subclause d of **Clause 5.6.2.** of this Policy apply, except where information has been disclosed when performing job or professional duties.

**5.6.3.** A Relevant person shall notify the respective Company about Personal transactions undertaken according to the rules established by the Company.

**5.6.4.** A Company may draw up internal rules prescribing a permission to be issued by a Company to a Relevant person for the execution of a Personal transaction. The permission shall be

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issued by the unit responsible for compliance control of Investment services within the Company.

**5.6.5.** If in accordance with Clause **5.6.4.** of this Policy Company permission is necessary for execution of Personal transaction, the information in regard to issued or rejected permissions shall be duly recorded and kept.

**5.6.6.** Clauses of the Policy shall not apply **5.6.2-5.6.5.** if personal transaction has been undertaken as part of the Portfolio management on an individual basis and there has been no prior communication in regard to the transaction between portfolio manager and a Relevant person or any other person on whose behalf the transaction has been undertaken;

**5.7. Register of Personal transactions**

**5.7.1.** A Company shall establish and maintain a register of Personal transactions.

**5.7.2.** The register of Personal transactions shall contain data about the Personal transactions which have been provided by a Relevant person or revealed during monitoring process.

**5.8. Measures to prevent and manage Conflict of interest in regard to Inducements paying or being paid in course of providing Investment services**

**5.8.1.** No Company is allowed to receive or pay Inducements from/to third persons in the course of providing Investment services, but in certain cases when it is allowed by applicable law, the Company may give and receive financial and non-financial Benefits to/from the third parties, when providing Investment services.

**5.8.2.** Inducements cannot be payments or Benefits, which are necessary for provision of the respective investment services or ancillary services, for example:

- (a) holding costs;
- (b) fees for transaction settlements and conversion;
- (c) statutory fees;
- (d) fees for legal services;
- (e) other payments


**5.8.3.** Inducements shall be considered acceptable only if the below requirements set out are met at all times:

- (a) they are justified by the provision of an additional or higher-level service to the Client ;
- (b) they shall not impair Company's duty to act honestly, fairly and professionally in accordance with the best interests of the Client ;
- (c) they do not directly benefit the Company – the recipient, its shareholders or employees without tangible benefit to the relevant Client;
- (d) they are justified by the provision of an on-going benefit to the relevant Client in relation to an on-going Inducement.

**5.8.4.** Inducements shall not be considered acceptable if the provision of relevant Investment service to the Client is biased or distorted as a result of Inducement.

**5.8.5.** The Company may receive and keep also small or insignificant non-financial Benefits that may improve the quality of services provided to the Client and which, assessed according to



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amount and nature, do not have a negative effect on the duty of the Company to act in the interest of the Client. The acceptable insignificant non-financial Benefits may be, for example:

- (a) information or documentation regarding a FI or investment service, which is general in its nature or personalized in order to reflect the circumstances of an individual Client;
- (b) a written material of a third party that has been ordered and paid for by the corporative issuer or possible issuer in order to promote a new emission of this company, or if the third person has statutory obligations with the issuer, and the issuer is paying to it so that it would regularly develop this material on a condition that these relationships are clearly reflected in the material, and the material is simultaneously made available to all companies of investment brokers or credit institutions wishing to receive it, or to a broader public;
- (c) participation in conferences, seminars and other training events on benefits and characteristics of a certain financial instrument or investment service;
- (d) participations in the marketing events paid by the issuer (road show), and is simultaneously available to all companies of investment brokers or credit institutions wishing to receive it, or to a broader public.
- (e) hospitality expressions with a reasonable *de minimis* value, for example, food and drinks during a work meeting or conference, seminar, or an expression of hospitality of other kind during the above-mentioned training event;
- (f) flowers, souvenirs, books or representation items, if the total value of non-financial Benefits received from one person during one year does not exceed the amount of one minimum monthly salary;
- (g) services and various discounts offered by commercial companies or individual merchants, and which are publicly available;
- (h) other non-material non-financial Benefits, which are reasonable and proportional, and are able to increase the quality of the services, received in the manner when such Benefits probably will not impact the activities of the Company in the way harming interests of the Clients.


**5.8.6.** The Company is not permitted to receive and keep Inducements within the framework of services of Portfolio management and independent Investment advice, except small or insignificant non-financial Benefits as it is stipulated in the **clause 5.8.5.** of the Policy.

**5.8.7.** According to the applicable law the Company shall disclose to the Clients information on Inducements being received from or paid to the third persons in relation of the Investment services.

**5.8.8.** The management board is entitled to set up additional conditions for the receiving of the non-financial Benefits.

**5.9. Measures to prevent and manage Conflict of interest for transactions with FI manufactured by Company**

**5.9.1.** If a Company intends to offer Clients to undertake transactions with FI manufactured by the Company itself or another Company, it shall comply with the following requirements:

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- (a) identification at a sufficiently granular level of the potential target market for each FI, ensuring the proposed transaction fully meets the interests of the Client;
- (b) assessment of the characteristics and risks of the particular FI;
- (c) regular (at least once per year) assessment and revision of offered and recommended FI, with the purpose to evaluate whether FI remains consistent with the identified target market and intended distribution strategy remains appropriate;
- (d) provision of FI distributors with information about relevant FI, including but not limited to information about FI approval process and the target market assessment;
- (e) shall provide its Clients with additional information explaining the differences between the FI and deposits placed with credit institutions in terms of yield, risk, liquidity and any protection provided in accordance with law.


**5.9.2.** A Company which manufactures FI with the purpose of offering this FI to its Clients shall implement and revise procedures concerning the FI approval process, the assessment of the target market, risks related to the identified target market and consistency of distribution strategy with the needs, characteristics and objectives of the identified target market.

## **6. Utilizing of the voting right arising of FI in the Client’s Portfolio**

- 6.1.** The Company acts with assets in the Client’s Portfolio on behalf of the own name but on account of the Client, observing Client’s interests only in frame of Investment policy.
- 6.2.** Company does not need any special Client acceptance to utilize voting rights arising from FI in Portfolio. The Company has the rights to participate in the shareholders and other meeting, to vote to subscribe on new issues, to accept and/or reject rights, arising from FI in Portfolio, to perform any actions, necessary for the realization of the rights arising of FI, and/or protection of the Client’s interests.
- 6.3.** Rendering services and on arising of possible Conflict of interest the Company is entitled to ask Client to provide direct instruction on decision in respect of relevant FI.

## **7. Final provisions**

- 7.1.** The Company established a unit responsible for compliance control in the area of Investment services provision.
- 7.2.** Once a year, the aforementioned units submit to the Management Board a report about identified and potential cases of Conflict of interest. If no Conflict of interest was identified, the Management Board of the Bank shall be informed accordingly about it.
- 7.3.** Each employee engaged in the provision of Investment services are obliged to inform his/her direct manager on each identified and/or potential Conflict of interest. Direct manager submits the received information to the respective unit responsible for compliance control of Investment services provision within Company, the responsible Unit informs the management Board. The responsible person of this unit forwards the received information to the Compliance Sector of the Bank.
- 7.4.** If reporting to the direct manager according to the Clause **7.3.** of the Politics is not possible or advisable the employee informs on identified and/or potential Conflict of interest only the unit responsible for compliance control of Investment services provision within Company.


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Alternatively, the employee may submit such information in accordance with “Code of Ethics” and internal rules determining the application of a disciplinary punishment. This information shall be subject to submission to Legal and Compliance department and to Client supervision department.

- 7.5. By receipt of information concerning identified or potential Conflict of interest, the Client Supervision Department without undue delay shall make aware the Management Board.
- 7.6. If organizational and administrative arrangements established by a Company to prevent or manage Conflict of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of the Clients will be prevented, before the provision of a service Company is obliged to make disclosure to the Client. The disclosure shall state and include:
  - (a) that the organizational and administrative arrangements established by Company to prevent or manage Conflict of interest are not sufficient to ensure, with reasonable confidence, that the risks of damage to the interests of the Client will be prevented;
  - (b) specific description of the Conflict of interest that arise in the provision of Investment service to the relevant Client;
  - (c) general nature and source of Conflict of interest, as well as the risks to the Client that arise as a result of the Conflict of interest and the steps undertaken to mitigate these risks.
- 7.7. The information referred to in Clause 6.6. of the Politics shall be provided in a durable medium with clear, fair and accurate information in sufficient detail to enable the Client to take an informed decision with respect to the Investment service in the context of which the Conflict of interest arises.
- 7.8. Company shall keep and regularly update a record of the relevant Investment services carried out by or on behalf of the Company in which a Conflict of interest entailing a risk of damage of interests of one or more Clients has arisen or may arise.
- 7.9. The Client Supervision department shall ensure that the Management of the Company regularly and at least once a year receives written reports on situations referred to in this Clause.
- 7.10. Policy shall be regularly updated on at least annual basis. Company regularly (at least on annual basis) shall update internal procedures regulating management and prevention of Conflict of interest in course of providing Investment services.
- 7.11. The full text of the Policy is available to Clients upon request. A description about management and prevention of Conflict of interest is available on the web page of the Company.
- 7.12. The breaches of this Policy rules and punishment hereof are investigated and applied as per the same procedure as for breach of any other Company internal rules in accordance with “Code of Ethics” and other internal rules regulating identification and investigation of the breaches of internal rules.
- 7.13. Measures on prevention and management of Conflict of interest related to gifts or gratitude are regulated by “Code of Ethics”.

## 8. References

- 8.1. The procedure on management of the Conflict of interests (*Interesu konflikta situāciju pārvaldīšanas procedūra*);

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**8.2.** Procedure on personal transactions (*Personīgo darījumu veikšanas procedūra*);

**8.3.** Code of Ethics (*Korporatīvo vērtību un ētikas kodekss*);

**8.4.** Oder execution policy (*Rīkojumu izpildes politika*)

## 9. Laws related to the Policy

**9.1.** The Policy is prepared and exercised according to the valid and binding legal acts of Republic of Latvia:

**9.1.1.** “Law on the Financial Instruments Market” ;

**9.1.2.** Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (recast).

**9.1.3.** Commission Delegated Regulation (EU) 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organizational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive.

**9.1.4.** Commission Delegated Directive (EU) 2017/593 of 7 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to safeguarding of financial instruments and funds belonging to clients, product governance obligations and the rules applicable to the provision or reception of fees, commissions or any monetary or non-monetary benefits.

**9.1.5.** FCMC 28.08.2018. rules No 139 “Rules on investment products management requirements”.

**9.1.6.** FCMC rules No 233 „ Rules on the establishment of the internal control system”.

## 10. Appendices

**10.1.** No

## Miscellaneous

Version	Valid since	Description of the version
<b>1/19</b>	<b>25.06.2019</b>	<b>New edition</b>
1/18	30.10.2018.	Without amendments
1/17	12.12.2017.	Without amendments
1/16	09.06.2016.	New edition