

## Summary of

# Group Guideline on Conflicts of Interest and Corruption Risks

## INTRODUCTION

*This document applies to: Sberbank Europe AG (SBAG) as a legal entity solely covering the Vienna office.*

A conflict of interest is a direct or indirect contradiction between the proprietary interests of SBAG and those of the staff and customer(s). SBAG's independently functioning Compliance department is committed to carefully managing potential and actual conflicts.

The list below gives an overview of possible conflicts of interest that can occur between SBAG and our clients. This list is not exhaustive. Employees of SBAG are instructed to consider all services and activities carried out within their capacity as a SBAG employee in order to identify and avoid any potential and actual conflicts of interest.

A conflict of interest can arise:

- Between a client and SBAG: potential conflicts may exist between client interests and the interests of a particular business or SBAG as a whole;
- Between clients of SBAG, if the interests of one client are in contradiction with the interests of another client;
- Between clients and employees or Board Members of SBAG;
- Between employees giving investment advice or other information recommending an investment strategy and those receiving them, including the media.

SBAG has established and operates various organisational, procedural and administrative arrangements designed to avoid and manage potential or actual conflicts of interests between its clients and its employees.

When providing advisory services to clients or when trading with or on behalf of its clients, SBAG employees must disregard their proprietary interests as well as the interests of SBAG as a legal entity.

## 1 MEASURES TO MITIGATE AND MANAGE CONFLICTS OF INTEREST

### Information barriers

Information barriers, which are also known under the notion of 'Chinese walls', are erected to prevent exchanges or communication that could lead to conflicts of interest. For the purposes of conflict of interest management, SBAG creates barriers which ensure an independent decision-making and the safety of information.

### Inducements and non-monetary benefits

Inducements provided to or by a third party in connection with the provision of non-independent investment advice are only permitted when they are designed to enhance the quality of the relevant service and the provision of financial services is not biased or distorted.

SBAG discloses to its clients, prior to the provision of the relevant service or ancillary service, information about the existence, nature and amount of the payments or benefits received from or paid to third parties. Additionally, SBAG informs its clients at least once a year on an individual basis about the actual amount of payments or benefits received or paid.

Accepted minor non-monetary benefits that enhance the quality of services and do not impair compliance with SBAG's duty to act in the best interest of the client are disclosed prior to the provision of relevant services to clients.

### Conflicts of interest related to gifts and other benefits

The acceptance of gifts and benefits of all kinds are subject to strict rules and closely monitored by the responsible department. Gifts and benefits of all kinds will not be granted if it is seen to give rise to a potential or actual conflict of interest or may affect the objectivity of decision-making of the employee in question.

### Remuneration

SBAG complies with the guidelines on remuneration policies and practices issued by European and Austrian Authorities purposing the avoidance of conflicts of interests. SBAG ensures that clients' interests are not impaired by any remuneration practices.

Internal regulations on remuneration principles are in place in order to remove any direct link between the remuneration of persons involved in situations where a conflict of interest may arise.

## Secondary occupations and relatives working together

SBAG requires their employees to notify the Bank on their secondary occupations and on any of their close relatives working within SBAG.

SBAG ensures that all employees strictly adhere to the internal approval procedures and do not jeopardize the interests of our customers. The strict application of internal approval process aims to avoid the occurrence of a conflict of interest between a SBAG client and an employee of SBAG.

All SBAG employees offering services or carrying out other activities such as consultancy services, heading a trust or administering a legal entity must adhere to the reporting obligations in case of a secondary occupation. Situations in which relatives work within SBAG, will be subject to an expert assessment and, if necessary, internal measures will be taken.

## Obligations of our employees on conflicts of interest

The employee who detects a potential or actual conflict of interest must promptly disclose it, according to the internal procedures.

## 2 COMPLAINT HANDLING

SBAG has a complaint procedure, which applies to complaints about, amongst others, conflicts of interest, unethical conduct or any other misconduct by one of our employees.

Further information can be found on our official website under '[Complaints management](#)'.

## 3 CORRUPTION AND BRIBERY

SBAG does not tolerate any form of corruption or bribery.

All SBAG employees are prohibited offering, giving, promising, asking for and accepting, whether directly or not, whether in person or through a third party, any bribes. It is prohibited to effect any payments to foster administrative, bureaucratic and any other procedures of any kind, including in the form of funds, values, services or other benefits, to or from any persons or organizations, including commercial organizations, Government and local authorities, Government and municipal officers, private companies and their representatives.

## 4 WHISTLEBLOWING

SBAG has implemented a publicly available whistleblowing system. All notifications via this system

are handled by the local Compliance department. This whistleblowing system is a highly secured communications platform and provides clients, third parties and our employees with the opportunity to submit reports about, amongst others, unethical conduct, criminal conduct or any other misconduct committed by the employees.

The reporting of white-collar crimes can be done anonymously or non-anonymously. The whistleblowing system can be directly accessed under the following link: <https://www.bkms-system.net/SBEU>.

## Final provisions

With this summary of the Group Guideline on Conflicts of Interest and Corruption Risks, Sberbank Europe AG transposes the relevant provisions on conflicts of interest in accordance with the WAG 2018 and the Commission Delegated Regulation (EU) 2017/565 of 25 April 2016.