

# Summary of Conflict of interest policy

## 1. General information

UniCredit Bank S.A. (the “Bank”) provides a wide range of products and services to a diversified client base. As a result, the Bank can face a number of potential conflicts of interest considering the broad range of activities performed.

Conflict of Interest refers to any matter involving the Bank, its relevant personnel and/or stakeholders, where either the Bank or an employee is in a position to exploit a professional or official capacity in some way to obtain an undue advantage, for either Bank or personal benefit (also potentially to the detriment of the Bank) damaging one or more customer or groups of stakeholders.

UniCredit Bank S.A. has un place a dedicated Conflict of Interest Policy and a Code of Conduct in order to ensure the existence of an adequate internal framework for increasing transparency and protection against the risk of conflicts of interest to which the Bank could be exposed, taking into account the wide range of activities carried out.

Conflicts of interest may arise:

- in the provision of investment services and activities.
- in the distribution of insurance products;
- in relation to the issuance of financial instruments;
- from banking activities and services, that could arise i) towards an associated person, ii) conflicts relating to shareholdings in non-financial companies and equity indirect investments;
- from relevant personnel’ outside business interests (“OBI”);
- as organizational conflicts;
- following potential services performed by external providers (including outsourcing).

The objective of the Bank is to identify conflicts of interest in the Bank as a whole and to prevent such conflicts of interest as far as possible.

If a conflict of interest cannot be prevented through organizational and administrative arrangements made by UniCredit Bank S.A., the Bank’s top priority is to resolve such conflict of interest in the interests of the Bank’s customers.

If the organizational and administrative arrangements made by the Bank are not sufficient to ensure that risks of damage to customers' interests are prevented, the Bank will disclose to the customer the general nature and source of the conflicts of interest before undertaking business on the customer's behalf.

## **2. Measures to identify and manage conflicts of interest**

- The establishment of Chinese walls between the Bank's various areas of confidentiality ensures that the forwarding of confidential information is limited to the extent necessary in the ordinary course of business (exceptions require special approval).
- The Bank manages conflicts based on the principle that customer interests take precedence over the interests of the Bank and its employees. If a conflict of interest cannot be prevented despite the organizational and administrative arrangements made by the Bank, the Bank must resolve such conflict of interest in the interests of customers. Possible ways of resolving such a conflict of interest include the disclosure of the conflict of interest to the customer(s) or refraining from a possible transaction.
- The Bank will only disclose a conflict of interest if there is no other way to resolve it. Disclosure will take place in accordance with the criteria defined above.
- The Bank issued internal guidelines and rules of conduct which serve to comply with the legal requirement of preventing market abuse (insider trading and market manipulation) by the Bank and its employees.
- There have been issued rules regarding its employees' own transactions and aimed at preventing conflicts of interest between the Bank's customers and the Bank's employees or, in case prevention is not possible, resolving them in the customers' interests.
- The Bank's remuneration arrangements are being designed so as to ensure that the remuneration of employees is not directly connected with payments made to, or income generated by, other employees whose activities are in a conflict of interest with activities of the former. The remuneration system does not rely only on financial parameters but also take into consideration performance qualitative aspects, honesty and transparency towards clients and business.
- The Bank's employees are not permitted to demand or accept, for themselves or for their relatives, payments, inducements or other benefits which might affect their independence.

Any additional details regarding Conflict of Interests Policy shall be made available to clients, at request, any time, on a durable medium.