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I Organizational and administrative provisions

Owner of the process: Compliance Control Division.

Title of the process: 13.11.1 Creation, monitoring and management of the working module of the compliance risk management.

Version	Effective date	Amendments	Number of pages
1.0	19 June 2010	New document	6
2.0	4 December 2015	General amendments	7
3.0	29 November 2017	General amendments	12

To recognise void: version 2.0.

Purpose of document

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:

- to ensure the protection of interests of the Clients of the Bank and the Subsidiaries providing Investment services;
- 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;
- to prevent or diminish Conflicts of interest and their adverse effects, which may arise in the course of providing Investment services.

Scope of validity

The Policy is binding on all employees of those Group entities, which provide Investment services unless the country legislation applicable to the respective Group entity provides otherwise. If required, a Group entity draws up the policy in line with the requirements of the country legislation applicable to the respective Group entity, which shall be approved by the Compliance Sector of the Bank.

If a Group entity is planning to use services of a Tied agent, it should obtain the approval of the Compliance Sector of the Bank and introduce respective procedures and measures with the aim to ensure effective supervision of compliance of the professional activity of the Tied agent.

If the Group entity takes the respective decision, then as far as practicable the measures and principles of the Conflict of interest identification, prevention and management outlined in this Policy are applicable to the Group entity engaged in the activity of providing management of the assets of the state-funded pension schemes, management of investment funds (UCITS) or management of alternative investment funds.

Terms, abbreviations

Bank – AS „Citadele banka”.

Client – a person, who has entered into an agreement about Investment services with at least one of the Group entities. The term “Client” in respect of Investment services provided also includes investment funds, state-funded pension schemes and private-funded pension schemes managed by the respective Group entity.

Conflict of interest – circumstances in which several persons are in a position to derive personal benefit from actions or decisions made in their official capacity. These circumstances may arise between Group entities, including employees of the Group entities, persons having direct or indirect control over the Group, between the Client and a Relevant person as well as between Clients of the Group.

Financial instruments/FI – financial instruments, as defined in the Law on the Financial Instruments Market of the Republic of Latvia.

Group/Group entity – Bank, all branches of the Bank, as well as Subsidiaries and associated companies that are subject to consolidation, which are engaged in the activity of providing Investment services.

Inducements - fees, commission fees, other monetary and non-monetary benefits, which the Group entity 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).

Investment advice – the provision of a personal recommendation upon the Client's request or by a Group entity on their own initiative with respect to one or several transactions with the FI.

Investment research – 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:
- it is designated as an Investment research or otherwise reflected as an impartial or independent explanation of the matters included in the research;
- it is not a recommendation given to the Client in course of providing Investment advice.

Investment services – scope of investment services and ancillary investment services as defined in the Law on the Financial Instruments Market of the Republic of Latvia, which are provided by the respective Group entity. Within the meaning of the Policy this term incorporates and refers to the investment services and ancillary investment services.

LR – the Republic of Latvia.

Personal transaction – transaction with FI effected by or on behalf of the Relevant person, where at least one of the following criteria is met:

- the transaction is carried out outside the scope of the activities of the Relevant person which are carried out in his/her professional capacity;
- the transaction is carried out for the account of the Relevant person;
- 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;
- 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.

Policy – AS "Citadele banka" PO0028 "Policy on the Prevention of Conflict of Interest Providing Investment Services".

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.

Relevant person in relation to the Group/Relevant person:

- the Chairman, a member of the Group's entity Management Board or the Supervisory Board or other person, who on behalf of Group entity takes significant decisions, creates civil obligations thereto;
- an employee of a Group entity as well as any other natural person, whose services are placed at the disposal and under the control of a Group entity and who is involved in the provision of Investment services and activities by the Group entity;
- a private individual who is directly involved in the provision of services to the Group under an outsourcing arrangement for the purpose of the provision by Group entity of Investment services.

Subsidiary – AS Citadele banka's subsidiaries and associated companies subject to consolidation.

Tied agent – a natural or legal person, who under the full and unconditional responsibility of the Group entity on whose behalf it acts, 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 recommendations to Clients or prospective clients in respect of those FI or services.

II Body of document

Main principles of the Policy

1. The Policy regulates the prevention and management of Conflict of interest arising in the course of providing Investment services by Group entities. The Policy does not apply to custodial services provided under the Law on Investment Management Companies, Law on Alternative Investment Funds and their Managers, Law on Private Pension Funds, Law on State-Funded Pensions.
2. The prevention and management of Conflict of interest is performed in view of the following core principles:
 - 2.1. assessment of the risk of damage to the interests of Clients;
 - 2.2. determination of restrictions on the execution of Personal transactions;
 - 2.3. keeping and maintaining the register of Personal transactions;
 - 2.4. supervision of Relevant persons, whose principal functions involve carrying out activities on behalf of Clients, or providing Investment services to Clients;
 - 2.5. monitoring and management of circumstances, which constitute or may give rise to a Conflict of interest.
3. Each Group entity implementing the provisions of the Policy takes into account the scope of Investment services it provides in light of their specific characteristics and features.
4. The Bank implements this Policy under the following conditions:
 - 4.1. The Bank does not provide asset management services, Investment advice or recommendations on capital markets;
 - 4.2. The Bank provides certain Investment services to several Group entities and investment funds, state/private pension schemes and alternative investment funds, which are managed by Group entities.
5. Group entities may draw up internal regulations for the purpose of production, dissemination and record keeping of marketing communication.
6. Group entities 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.

Identifying the types of Conflict of interest

7. Conflicts of interest may arise in the course of providing Investment services by Group entities between:
 - 7.1. a Group employee and a Client;
 - 7.2. an individual, who has direct or indirect control under any of the Group entities, and/or a Client;
 - 7.3. Clients of the Group;
 - 7.4. a Client and a Relevant person;
 - 7.5. investment funds, alternative investment funds or state/private-funded pension schemes managed by a Group entity;
 - 7.6. a Relevant person and a Group entity;
 - 7.7. Group entities.
8. The circumstances which constitute or may give rise to a Conflict of interest between persons under Clause 28 of this Policy are the following:
 - 8.1. an execution of FI orders on behalf of more than one Client at the same time;
 - 8.2. a Group entity or its employee executes, or is planning to execute, a transaction with FI at the same time as a Client of the Group entity submits or executes a transaction in relation to the same FI;
 - 8.3. an execution of orders related to FI distributed by Group entity;
 - 8.4. an execution of orders related to FI issued by Group entity;
 - 8.5. carrying proprietary trading and trading on behalf of a Client at the same time;
 - 8.6. an execution of limit order in relation to debt securities;
 - 8.7. a Group entity paying or being paid any fee or commission or providing or being provided with any non-monetary benefit from third parties in connection with the provision of Investment services to the Clients;
 - 8.8. an employee of a Group entity 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;
 - 8.9. an employee of Group entity or a Relevant person has access to inside information about the executed/planned transactions of the Client;
 - 8.10. a Group entity as a manager of the investment fund selling the certificates of the investment funds to increase the commissions for the management services, that depend on net asset value of the investment fund;
 - 8.11. in the course of providing Investment services to the Clients, a Group entity takes into consideration the circumstances when a Relevant person:
 - 8.11.1. is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
 - 8.11.2. 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;
 - 8.11.3. has a financial or other incentive to favor the interest of another Client or group of Clients;
 - 8.11.4. carries out the same business as the Client;
 - 8.11.5. 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.
 - 8.12. a Group entity offers the FI mentioned below to the Clients and/or Relevant persons or the Clients and/or Relevant persons that already holds the FI:
 - 8.12.1. of those issuers, to whom a Group entity provided a service of placement and underwriting, or assisted in performing this placement and underwriting to the third persons;
 - 8.12.2. a Group entity provides liquidity to / acts as a market maker for;
 - 8.12.3. issued/managed by a Group entity and/or a Group entity is a depository of these FI;
 - 8.12.4. advised for holding by a Group entity;
 - 8.12.5. for which a Group entity entered into a distribution agreement and receives Inducement for distribution of;
 - 8.12.6. of the issuer, which is a Client of any Group entity.
 - 8.13. Manufacturing of the FI by Group entity. Group entity shall assess whether the FI creates a situation where end-Clients may be adversely affected if they take:
 - 8.13.1. an exposure opposite to the one previously held by a Group entity itself; or
 - 8.13.2. an exposure opposite to the one that a Group entity wants to hold after the sale of the FI.

Measures to prevent circumstances of the Conflict of interest

General provisions

9. A Group entity shall in line with its size and organization as well as the nature, scale and complexity of its business establish, implement and maintain 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.
10. By establishing the procedures and measures for the prevention of Conflict of interest, a Group entity shall ensure that they are proportionate to the damage to the interest of the Clients.
11. A Group entity shall establish 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 Group entity providing Investment services or manufacturing FI possess the necessary knowledge and competence to fulfil their obligations.
12. A Group entity 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.
13. If a Group entity is offering FI issued by itself or by another Group entity 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 Group entity considers refraining from engaging in this activity in order to prevent any adverse effect on its Clients.

14. If a Group entity 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 Group entity shall draw up necessary arrangements which regulate FI distribution.

Measures to prevent and manage Conflicts of interest by executing Client orders for FI trading

- 15. Those Group entity employees, who are engaged in providing the Investment services, shall not be involved in decision-making in any way related to the proprietary trading activities conducted by the respective Group entity.
- 16. Client orders are executed in line with the order execution policy of the respective Group entity.
- 17. A Group entity 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 Group entity included), which may conflict with the interests of the Client.
- 18. A Group entity 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.
- 19. A Group entity prohibits a Relevant person to give any recommendations in respect of trading with FI issued by the Group entity or any other entity not related to the Group entity.
- 20. A Group entity ensures separate rules for executing limit orders given at the initiative of the Client in respect of debt securities.

Measures to prevent and manage Conflicts of interest when providing safekeeping services

- 21. Group entities in its records account the FI belonging to its Clients in the name of the respective Client and separately from its own FI.
- 22. Group entities ensure that the FI of the Client is identifiable separately from the FI owned by other Clients and from the FI owned by the Group entities.

Measures to prevent and manage Conflicts of interest when providing Portfolio management

- 23. Those Group entity employees, who are engaged in providing Portfolio management services, shall not be involved in decision-making in any way related to the proprietary trading activities conducted by the respective Group entity.
- 24. A Group entity removes any direct link between remuneration of employees and revenues generated by the investment portfolio of the Client.
- 25. In cases where a Group entity providing Portfolio management intends to include in the Client portfolio FI issued by itself or another Group entity, Clients shall be informed thereof, as well as of risk related to this FI and about other possible investment alternative.

Measures to prevent and manage Conflicts of interest when producing Investment research

- 26. No Group entity produces Investment research.
- 27. A Group entity may receive Investment research produced by the third party in return of direct payments by Group entity out of its own resources. This Investment research may be used only for the purposes of Group entity and shall not be published or disseminated to Clients.

Restrictions on undertaking Personal transactions

- 28. A Group entity shall ensure measures for Personal transactions monitoring and if required prescribes restrictions on undertaking Personal transactions.
- 29. A Relevant person is prohibited from the following:
 - 29.1. undertaking a Personal transaction on the basis of inside information of a Group entity it may possess as a result of job or professional duties within a Group entity;
 - 29.2. undertaking a Personal transaction by using or inappropriately disclosing confidential information;
 - 29.3. undertaking a Personal transaction, which conflicts or is likely to conflict with the state legislation applicable to a Group entity or with internal rule of a Group entity;
 - 29.4. 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):
 - 29.4.1. the transaction is undertaken on the basis of inside information of a Group entity 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;
 - 29.4.2. the transaction conflicts with the state legislation applicable to a Group entity or with internal rule of the Group entity;
 - 29.4.3. the transaction is undertaken on the basis of misuse information about unexecuted or pending Client orders.
 - 29.5. 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 Clauses 29.4.1 - 29.4.3 of this Policy apply, except where information has been disclosed when performing job or professional duties.
- 30. A Relevant person shall notify the respective Group entity about Personal transactions undertaken according to the rules established by the Group entity.
- 31. A Group entity may draw up internal rules prescribing a permission to be issued by a Group entity to a Relevant person for the execution of a Personal transaction. If applicable, the permission shall be issued by the unit responsible for compliance control of Investment services within the respective Group entity.

32. If in accordance with Clause 31 of this Policy Group entity permission is necessary for execution of Personal transaction, the information in regard to issued or rejected permissions shall be duly recorded and kept.
33. Clauses 29.4.3 - 32 of this Policy are not applicable in the following cases, where:
- 33.1. a 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;
- 33.2. a personal transaction has been undertaken with investment fund units (UCITS) or alternative investment fund units supervised in accordance with European Union laws and regulations, regulating equal risk allocation among the fund's assets provided that a Relevant person or another person on whose behalf the transaction has been undertaken are not involved in the management of this fund.

Register of Personal transactions

34. A Group entity shall establish and maintain a register of Personal transactions in regard to the Personal transactions of employees from the units engaged in Investment services provision within the respective Group entity.
35. 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.

Measures to prevent and manage Conflicts of interest in regard to Inducements paying or being paid in course of providing Investment services

36. Clauses 1 – 42 of this Policy are applicable to Group entities, which do not provide Investment advice or Portfolio management. Clauses 43 – 44 of this Policy are applicable to Group entities, which provide Investment advice and Portfolio management, provided that such Group entities shall draw up internal procedures to ensure compliance with the requirements in regard to paying or being paid Inducements and information disclosure thereof to and by Clients. This internal procedure shall be subject to submission to the Compliance Sector of the Bank.
37. No Group entity is allowed to receive or pay Inducements from/to third persons in the course of providing Investment services except in cases prescribed by Clause 38 of this Policy.
38. If any Group entity intends to receive or pay Inducements from/to the third persons in the course of providing Investment services it shall draw up internal procedure under Clauses 39 - 42 of this Policy to ensure compliance with the requirements in regard to Inducements being paid or received and information disclosure thereof from or to Clients. This procedure is subject to the approval by the Compliance Sector of the Bank. As long as requirements of this Clause are not fulfilled it is prohibited to receive or pay any kind of Inducements (including non-monetary and minor non-monetary benefits).
39. Inducements shall be considered acceptable only if the below requirements set out are met at all times:
- 39.1. they are justified by the provision of an additional or higher-level service to the Client, proportional to the level of Inducements received;
- 39.2. they shall not impair Group entity's duty to act honestly, fairly and professionally in accordance with the best interests of the Client.
- 39.3. they do not directly benefit the Group entity – the recipient, its shareholders or employees without tangible benefit to the relevant Client;
- 39.4. they are justified by the provision of an on-going benefit to the relevant Client in relation to an on-going Inducement.
40. 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.
41. Group entity shall disclose to the Client in a full and comprehensive way as prescribed by the applicable law any Inducement received from or paid to third parties in the course of providing Investment services.
42. Group entities shall not receive Inducements for routing Client orders to a particular trading venue or execution venue.
43. Group entities providing Investment advice on an independent basis and/or Portfolio management are prohibited from accepting and retaining third party Inducements in relation to the provision of these services to Clients. Any fees, commissions or any monetary benefits paid or provided by any third party or a person acting on behalf of a third party are allocated and transferred to each individual Client as soon as practically possible.
44. Group entities providing Investment advice on an independent basis and/or Portfolio management shall not accept non-monetary benefits that do not qualify as acceptable minor non-monetary benefits in accordance with applicable law.

Measures to prevent and manage Conflicts of interest for transactions with FI manufactured by Group entity

45. If a Group entity intends to offer Clients to undertake transactions with FI manufactured by the Group entity itself or another Group entity, it shall comply with the following requirements:
- 45.1. 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;
- 45.2. assessment of the characteristics and risks of the particular FI;
- 45.3. development of distribution strategy, which is consistent with the identified target market;
- 45.4. 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;
- 45.5. provision of FI distributors with information about relevant FI, including but not limited to information about FI approval process and the target market assessment.
46. A Group entity, which intends to offer FI issued by itself or by another Group entity to Clients in certain circumstances and under requirements of applicable law 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.
47. A Group entity 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.

Final provisions

48. Each Group entity establishes a unit responsible for compliance control in the area of Investment services provision within the Group entity.
49. Once a year, the aforementioned units submit to the Compliance Sector of the Bank a report about identified and potential cases of Conflict of interest. If no Conflict of interest was identified, the Compliance Sector of the Bank shall be informed accordingly about it.
50. Each employee of any Group entity 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 Group entity. The responsible person of this unit forwards the received information to the Compliance Sector of the Bank.
51. If reporting to the direct manager 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 Group entity. Alternatively, the employee may submit such information in accordance with PO0017 "Code of Ethics" and internal rules determining the application of a disciplinary punishment. This information shall be subject to submission to Compliance Sector of the Bank.
52. By receipt of information concerning identified or potential Conflict of interest, the Compliance Sector of the Bank without undue delay shall make aware the Management Board of the Bank hereof.
53. If organizational and administrative arrangements established by a Group entity 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 Group entity is obliged to make disclosure to the Client. The disclosure shall state and include:
 - 53.1. that the organizational and administrative arrangements established by Group entity 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;
 - 53.2. specific description of the Conflict of interest that arise in the provision of Investment service to the relevant Client;
 - 53.3. 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.
54. The information referred to in Clause 53 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.
55. Group entities shall keep and regularly update a record of the relevant Investment services carried out by or on behalf of the Group entity in which a Conflict of interest entailing a risk of damage of interests of one or more Clients has arisen or may arise. The Compliance Sector of the Bank shall ensure that the Management Board of the Bank regularly and at least once a year receives written reports on situations referred to in this Clause.
56. The Policy shall be regularly updated on at least annual basis. Group entities regularly (at least on annual basis) shall update their internal procedures regulating management and prevention of Conflict of interest in course of providing Investment services.
57. 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 respective Group entity.
58. The breaches of this Policy rules and punishment hereof are investigated and applied as per the same procedure as for breach of any other Bank's internal rules in accordance with PO0017 "Code of Ethics" and other internal rules regulating identification and investigation of the breaches of internal rules.
59. Measures on prevention and management of Conflict of interest related to gifts or gratitude are regulated by PO0017 "Code of Ethics".

III Appendices and binding documents**Appendices:**

60. None.

Binding documents:

61. Law on the Financial Instruments Market of the Republic of Latvia.
62. 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).
63. 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.
64. Commission Delegated Regulation (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.
65. PO0017 Code of Ethics.
66. PO0029 Anti – corruption policy.
67. PR0311 Performance and control of personal transactions with financial instruments.
68. IN0173 Performance and control of transactions with financial instruments issued by AS Citadele banka.