



## **CONFLICT OF INTEREST POLICY**

1. The possible conflicts of interest arising during investment activities are as follows:
  - 1) Execution of transaction(s) with clients at prices other than market prices in favor of the company and/or its employees and to the detriment of the client;
  - 2) Sale of securities owned by the client to the bank, any employee of the Bank or parties related to the bank and/or any employee of the bank or to any other party at lower-than-market prices;
  - 3) Investment of client's funds into securities owned by the bank, any employee of the bank, parties related to the bank or any employee of the bank or any other party;
  - 4) Execution of explicitly unnecessary or unfavorable transactions at the account of the client with the sole purpose of earning commissions;
  - 5) Use of the confidential and other sensitive information provided by the client with the aim of getting benefit for the bank, any employee or related or affiliated person of the bank, to the detriment of the client;
  - 6) Execution of such transactions in securities which even if in favor of one client result in losses for another client.
2. This list by no means covers all possible conflicts of interest arising during investment activities. Other conflicts of interest may arise which are not listed herein.
3. **PROTECTION OF CLIENT INTERESTS AND PREVENTION OF CONFLICT OF INTEREST WHILE PERFORMING INVESTMENT SERVICES**

To prevent conflicts of interest the bank adheres to the following rules:

- 1) Any transaction of the client should be executed only based on a properly completed order.
  - 2) No transaction should be executed which is likely to adversely affect the interests of the client.
4. While performing operations on securities markets the bank is governed only by the interests of the clients. To ensure protection of the clients' interests, all employees of the bank should:
  - 1) Adhere to the requirements of the Republic of Armenia legislation and internal legal acts of the bank and comply with corporate and business ethics;
  - 2) Not execute any explicitly needless or unfavorable transactions only with the purpose of gaining commission;
  - 3) Be honest and committed, act in good faith and in businesslike manner



5. While performing transactions on behalf of the bank or the client and at the expense of the client the bank and the relevant employee of the bank shall make sure that all such transactions are objective and accurate and executed in a timely manner. Other orders of the client with equal terms should be executed by the first accepted-first serviced principle.
6. While performing transactions on behalf of the bank or the client and at the expense of the client the bank and the relevant employee of the bank shall:
  - 1) Make sure that all orders are properly registered and submitted for execution
  - 2) Other orders with equal terms should be executed by the first accepted-first serviced principle, except where this is impossible due to specifics of the order or situation on the market.
  - 3) Where there is an order from the client the bank shall not execute other transactions identical to it until the order is executed.
  - 4) Immediately inform the client of any major obstacle or implication which is likely to prevent the bank from executing the client's order properly or accurately.