

**ARTICLE 1**

- 1.1. PARTNERS INVESTMENTS, o.c.p., a.s. ("PI" or the "Company") lays down the following measures and procedures:
- to prevent, minimize and cope with any possible conflict of interest in providing investment services, ancillary services and conduction investment activities,
  - To protect confidential information,
  - To execute special transactions,
  - To prevent market manipulation,
  - To maintain confidentiality and protect data.

**ARTICLE 2**

- 2.1 **Relevant Persons** are defined by PI as:
- a) Members of the Executive Board, shareholders, managerial employees or bound investment agents,
  - b) Members of the Executive Board of a bound investment agent, members, shareholders or managerial employees of a bound investment agent,
  - c) Employees of PI or its bound investment agents and other natural persons providing services to PI and controlled by them or by its bound investment agents participating in the provision of investment and ancillary services, and in the performance of PI's investment activities,
  - d) Natural persons participating in the provision of services to PI or its bound investment agents based on a delegation agreement for the purposes of providing investment and ancillary services, and of performance of PI's investment activities.
- 2.2 **Close Persons of a Relevant Person** - direct relatives, siblings, spouse and other persons with family or other similar relationship with the Relevant Person, whose harm would be perceived by the Relevant Person as their own.
- 2.3 **Personal Transaction** - a financial instrument transaction executed by a Relevant Person or on their behalf, provided that either of the following conditions is met:
- a) The Relevant Person acts beyond the scope of the rights and obligations by virtue of their employment,
  - b) The transaction is executed for the account of any of the persons below:
    - The Relevant Personô

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- The Relevant Person's Close Person and any other person deemed under legislation of another Member State to be a person with a position equaling that of a spouse or another relative of the Relevant Person, who has lived with the Relevant Person in a common household for at least one year prior to execution of the transaction;
- A person with a relationship to the Relevant Person that gives rise to the Relevant Person's direct or indirect interest, other than a transaction fee or commission, in the transaction result.

2.4 **Confidential Information** - accurate information that has not been published yet and concerns, directly or indirectly, one or several issuers of financial instruments, or a financial instrument or several financial instruments, whose disclosure would significantly affect the rate or price of such financial instruments.

For the persons commissioned to execute orders concerning financial instruments, it also means information a Client provides in respect thereof not yet executed, which is accurate and relates directly or indirectly to one or several issuers or one or several financial instruments and whose disclosure to the public would most likely significantly affect the prices of such financial instruments, prices of related spot agreements concerning commodities, and/or prices of related derivative financial instruments.

Such persons are not permitted:

- To engage or attempt to engage in insider trading;
- To recommend another person to engage in insider trading or induce another person to engage in insider trading, or
- Disclose confidential information without authorization.

2.5 **Accurate Information** - information that indicates a set of circumstances that have occurred or may occur, or an event that has occurred or may occur, which is sufficiently specific to allow a conclusion to be drawn about the possible impact of the set of circumstances or events on the rate or price of financial instruments.

In the case of persons executing orders related to financial instruments, Confidential Information also includes accurate information provided to such persons by Clients, which directly or indirectly concerns one or several issuers of financial instruments, or one or several financial instruments and whose disclosure would significantly affect the rate or price of such financial instruments.

2.6 **Insider** - a legal or natural person who has acquired Confidential Information as a consequence of any of the following:

- Their position as a member of statutory, management, and supervisory bodies of an issuer;

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- b) Their participation in an issuer's registered capital;
- c) Their access to information by virtue of their employment, occupation or position,
- d) From perpetrating a crime.

2.7 **Market Manipulation** is defined in Article 6 hereof.

2.8 **The Act** is Act 566/2001 on securities and investment services, as amended.

### **ARTICLE 3 - CONFLICT OF INTEREST IDENTIFICATION**

- 3.1 A conflict of interest is a mutual clash of interests that may occur or has been detected during the provision of investment services, ancillary services and the performance of investment activities between the Company, its Relevant Persons and persons connected to the Company through a relationship involving direct or indirect control on one hand and Clients on the other hand, or between the Company's Clients, or between the Company and its Relevant Person, in which one party may abuse or will abuse its position or information for its own unjustified benefit at the expense of the other party. This particularly means the following situations where the Company, its Relevant Persons discharging their obligations by virtue of their employment/position or persons affiliated with the Company through direct or indirect control, and each of them individually or all of them jointly:
- a) Possibly making a financial gain or preventing a financial loss at the expense of a Client;
  - b) Possibly having an interest in the outcome of investment services, ancillary services provided to the Client or the outcome of a transaction executed on the Client's account and where that interest differs from the Client's interest therein;
  - c) Having financial or other motivation to prefer the interest of another Client or a group of Clients to the interests of the Client concerned;
  - d) Having been conducting the same activities as the Client;
  - e) Having received or possibly having received a benefit in the form of money, goods or services in connection with an investment or ancillary service provided to the Client from a person not a Client, or not a usual commission or fee for the given service.
- 3.2 The Company is obliged to take all necessary action to detect mutual conflicts of interest between it and members of its top management, employees, financial agents, persons connected with the securities dealer on the basis of direct control or indirect control, and its clients or between Clients, which arise while providing investment services, ancillary services and during the performance of investment activities or within their

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combination. Could a conflict of interests not be avoided during the provision of investment services, ancillary services or performance of investment activities, the Client shall then be notified of the nature and source of the conflict prior to the provision of such service or performance of an activity, and in the case of the provision or performance thereof, the Client's interests shall be prioritized over the Company's interests, and, in the event of a conflict of interests, equal and fair treatment of all Clients must be ensured.

- 3.3 PI shall identify and monitor the situations below within which a conflict of interest may occur:
- a) PARTNERS INVESTMENTS will be making a financial gain or preventing a financial loss to the detriment of a Client;
  - b) PI has an interest in the result of an investment service provided to a Client or the outcome of a transaction executed on behalf of a Client and that interest differs from the Client's interest in the result;
  - c) PI has a financial or other motivation to prioritize the interest of another Client or a group of Clients over the interests of the Client concerned;
  - d) PARTNERS INVESTMENTS conducts business activities in the same area as the client;
  - e) PI or an employee receives or will receive from a person who is not a client an incentive in the form of monetary or non-monetary benefits or services in connection with the service provided to a Client.
- 3.4 A conflict of interest between the Company and its Relevant Person, when carrying out personal transactions, on one hand and Clients on the other hand may arise in particular from the following:
- a) Executing a Client's order so that the Company buys/sells financial instruments from its own portfolio to the Client. Such a situation is not permitted under PI's authorization to provide investment services,
  - b) Executing a Client's order so that the Company buys/sells financial instruments from the portfolio of one Client to the portfolio of another Client. Such a situation is not permitted under PI's authorization to provide investment services,
  - c) Executing Personal Transactions through purchase/sale of financial instruments from/to portfolios of Clients. Such a situation is not permitted under PI's authorization to provide investments services,
  - d) By using the information about a Client's future order to execute Personal Transactions or transactions for the Company's own portfolio. PI does not execute any transactions for its own portfolio;

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- e) By using Confidential Information to execute Personal Transactions or transactions on the Company's account. PI does not execute any transactions for its own portfolio,
  - f) By failing to comply with procedures applicable to the processing of Clients' orders by preferring one Client over another in order to achieve a higher profit for the Company;
  - g) By misusing information a Relevant Person has obtained in performing their job/function that does not involve provision of investment services, ancillary services or performance of investment activities.
- 3.5 A conflict of interests between Clients arises mainly when one Client is favored over another Client (e.g. in order to obtain a benefit in the form of money, goods or services, which is not a usual commission and which the Company or its Relevant Persons receive from a preferred Client or from a person other than the parties involved in the transaction).
- 3.6 Insider trading arises where a person possesses Confidential Information and uses that information to acquire or dispose of financial instruments to which that information relates for their own account or for the account of a third party directly or indirectly. Insider trading is also considered the use of Confidential Information to cancel or change an order related to the financial instrument to which this information applies or where the order has been placed before the Relevant Person obtains the Confidential Information.
- 3.7 Recommending another person to engage in insider trading or inducing another person to engage therein is considered to have occurred when a person possesses Confidential Information and, based on that information, the person recommends either another person to acquire or transfer financial instruments to which the information pertains or induces another person to execute such an acquisition or transfer, or recommends from the information that either another person cancel or modify an order related to the financial instrument to which the information pertains or induces another person to execute such a cancellation or modification.

#### ARTICLE 4 - MEASURES TO PREVENT/HANDLE A CONFLICT OF INTEREST

- 4.1 The Company has introduced adequate measures in its internal rules to prevent and minimize possible conflicts of interest and misuse of Confidential Information.

##### **Organizational measures, access to information**

The Company's organizational rules set out each department's own competencies with "firewalls" separating (with respect to the Company's size) activities related to the provision of investment and ancillary services from execution of investment activities. The Company's organizational structure diversifies access by Relevant Persons to informa-

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tion. Other related internal corporate regulations governing procedures for providing investment and ancillary services and for performance of investment activities include measures to prevent a conflict of interest.

The Company has adopted and complies with the following conflict-of-interest management rules:

- **“Firewalls”**, i.e. effective **procedures to prevent or control the exchange of information** between employed Relevant Persons engaged in activities that pose a risk of a conflict of interest, if the exchange of this information could harm the interests of one or more Clients. The Company’s organizational structure is set up to comply with rules for the separation of incompatible functions, such as separating staff members and systemically preventing the unwanted flow of information between individual organizational units;
- **Separate and independent supervision over employees** whose main tasks involve **performance of activities on behalf of Clients or provision of services to Clients** and whose interests may collide, or over persons who otherwise promote various interests, including PI’s interests, which may collide. PI has established organizational units, in its management and control system that separately and independently supervise compliance and have sufficient authority to identify conflicts of interest and enforce measures to eliminate and manage them;
- **Elimination of remuneration cross-links**, where PI has eliminated any direct connection between the remuneration of employees who primarily perform one activity and the remuneration of other employees and/or income generated by other employees who primarily perform another activity, where a conflict of interest may arise from the relationship between them;
- **Arrangements that prevent or restrict** any person from unduly influencing the manner in which an employee carries out investment or ancillary services or activities;
- **Measures to prevent or control** the simultaneous or successive participation of an employee in the performance of separate investment or ancillary services or activities, where such participation could harm the proper resolution of conflicts of interest.

Should the organizational or administrative measures adopted by PI to prevent adverse effects of conflicts of interest on Clients’ interests be insufficient, with reasonable confidence, to prevent the risk of harm to a Client’s interests, PI will clearly inform the Client about the general nature and/or source of the conflict of interest and measures adopted to mitigate such risks prior to execution of a transaction on their behalf.

The Client is entitled to decide, without unreasonable obstacles, whether their relationship with PI will continue or not.

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### **Personnel measures**

The Company is not allowed to violate financial market regulations such as: "A central depository employee must not be an employee of PI or have another employment relationship with PI. A member of the Government of the Slovak Republic, head of a central public administration authority who is not a member of the Government of the Slovak Republic, member of the National Council of the Slovak Republic, employee of a central public administration authority of the Slovak Republic, the National Bank of Slovakia, Office of the President of the Slovak Republic, Office of the National Council of the Slovak Republic, the Supreme Audit Office of the Slovak Republic, Constitutional Court of the Slovak Republic, Supreme Court of the Slovak Republic, Office of the Prosecutor General of the Slovak Republic, Slovak Intelligence Service, may not be a member of the Executive Board or the Supervisory Board or an employee of the Company. This shall not apply where an employee of a central public administration authority is posted by their employer to take a position in those bodies."

### **Other measures to prevent a conflict of interest**

Relevant Persons are obliged to familiarize themselves and comply with the restrictions, prohibitions and obligations set forth in these guidelines that relate to the execution of Personal Transactions, prohibition of the use of Confidential Information, prohibition of market manipulation and breach of the obligation of confidentiality.

- 4.2 Should any circumstance occur, despite measures aimed at prevention of conflicts of interest, where such measures do not suffice to prevent harm to a Client, the Company shall take the following actions:
- a) Acquaint the Client (on a durable medium) with the nature and sources of the conflict of interests before making a trade on their account, to such an extent that the Client can form a correct judgment and decide on the next course of action;
  - b) Always prioritize interests of the Client over the interests of the Company and its Relevant Persons;
  - c) Secure equal and fair treatment of all Clients where the established conflict of interest is between Clients.

### **4.3 Registration of Conflicts of Interest**

The Company's employee shall notify the Compliance Department of the nature and source of any conflict of interest. Such notices serve to keep records of conflicts of interest.

The Compliance Department maintains and regularly updates records concerning the investment and ancillary services and investment activities performed by the Company or on its behalf within which either a conflict of interest has occurred and poses a risk of harm to the interests of one or several Clients, or a conflict of interest may occur. The Compliance Department submits annual reports covering the situations specified in this provision.

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**ARTICLE 5 - RULES APPLICABLE TO PERSONAL TRANSACTIONS**

- 5.1. **Relevant Persons** either engaged in activities that may give rise to a conflict of interest or those with access to Confidential Information **are prohibited from** the following:
- a) **Entering into a Personal Transaction** unless:
    - those persons hold a prior written permit granted by the CEO to conclude such a transaction;
    - the transaction does not involve any misuse or unlawful disclosure of Confidential Information;
    - the transaction is not and may not contradict the Company's obligations under applicable legislation;
  - b) **Recommending or inducing** any person to act beyond the scope of the rights and obligations by virtue of their employment or service provision agreement to conclude a transaction with financial instruments,
  - c) **Making available**, otherwise than within performance of their employment or a service provision agreement, to any third party any information or opinions where the Relevant Persons is or should be aware that, following such disclosure, the third party may:
    - conclude a transaction with financial instruments; or
    - recommend that another person conclude such a transaction.
- 5.2. In situations not covered by Clause 5.1 **Relevant Persons may conclude Personal Transactions provided** they comply with all conflict-of-interest measures, notification obligations, and with fundamental ethical principles. Relevant Persons shall likewise in particular:
- give priority to Clients' interests over the interests of the Company and Personal Transactions;
  - give priority to the Company's interests over Personal Transactions;
  - refrain from using Confidential Information for their unjust benefit;
  - refrain from receiving any financial benefits and/or benefits in kind that do not represent a usual commission;
  - notify the Company of each Personal Transaction they execute to the extent and in the manner specified herein.
- 5.3. Provisions set forth in Clauses 5.1 to 5.2 do not apply to Personal Transactions with units

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of an open mutual fund, securities of European funds or foreign collective investment entities, in which the legislation of the Member States ensures an equivalent limitation and spread of risk when investing their assets, if the person on whose account the transactions are executed does not have responsibility in connection with the management of the open mutual fund, European fund or foreign collective investment entity.

- 5.4. Relevant Persons are obliged to comply with the restrictions and prohibitions regarding the execution of Personal Transactions and resulting from both these rules and legislation of general application. Failure to comply with these prohibitions and to fulfill obligations will be considered a particularly serious violation of work discipline and may result in immediate termination of employment.
- 5.5. Financial analysts and Relevant Persons implementing investment recommendations or carrying out investment surveys **are prohibited from** the following:
- Executing Personal Transactions or trading on the account of another person, including the Company, in financial instruments subject to investment research, or in related financial instruments where the financial analyst or another person has knowledge of the likely time frame or content of the investment research conducted, and this knowledge is not publicly available and cannot be easily deduced from publicly available information until the addressees of the investment research have had an available opportunity to act on them. This rule does not apply where they act in good faith as market operators within the normal job description of a market operator or where they execute an unsolicited order placed by a Client;
  - Disseminating investment recommendations or investment research within PI, whereby information firewalls exist between analysts and other employees of PI;
  - Executing Personal Transactions with financial instruments related to investment research, or with associated financial instruments, contrary to current recommendations. This rule does not apply where, in an exceptional case, the CEO has given prior written consent to such a Personal Transaction;
  - Receiving any financial or other incentive from persons who have a personal interest in the subject of investment research;
  - Promising issuers favorable research outcomes.

Prior to publishing investment research results or submitting a draft investment research to a Client, Relevant Persons who are not financial analysts and other persons are prohibited from assessing draft investment research to verify the correctness of specific statements therein or for other purposes where the draft contains a recommendation or

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a target price. This rule does not apply to verification of compliance with the obligations under legislation of general application.

- 5.6. PI complies with **requirements applicable to the pricing of an issue** of financial instruments through established systems, controls and procedures for identifying conflicts of interest that arise in relation to possible undervaluation or overvaluation of the issue price or the involvement of Relevant Persons therein, as well as to prevent such conflicts of interest and for resolving them. Specifically, PI has implemented internal measures simultaneously to ensure the following:
- a) That pricing of an offering does not promote interests of other Clients or PI so that they may collide with the interests of the issuing Client;
  - b) Avoidance of any situation where the persons in PI responsible for providing services to Clients are directly involved in decision-making when consulting in corporate financing with regard to the setting of the issuing Client's price or the resolution thereof.
- 5.7. PI complies with **specific requirements applicable to placement of issues**. For this purpose, PI has implemented efficient internal measures to ensure that no persons responsible for provision of services to Clients would participate directly in decision-making in respect of recommendations to issuing Clients, thereby eliminating the risk of a conflict of interest. In particular, the following is not allowed when financial instruments are placed:
- a) Laddering, defined as placements made to induce a Client to pay disproportionately high fees for unrelated services provided by PI, such as disproportionately high fees or commissions, or to trade in disproportionately high volumes at the normal commission level as compensation for accepting placement of the issue. Similarly, the sale of comparable securities from one issuer (e.g. mortgage bonds of one bank) for five times higher fees than securities of another issuer (i.e. mortgage bonds of another bank) is prohibited;
  - b) Spinning, defined as placements for a top manager or managerial employee of an existing or potential issuing Client while considering future or already made allocations of corporate financing;
  - c) Placements made expressly or implicitly conditioned by PI receiving future orders or purchase of another services from PI by an investment Client or any entity whose managerial employee is the investor.
  - d) PI shall introduce an allocation policy for the placement of financial instruments establishing the procedure for the creation of allocation recommendations. The allocation

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policy is provided to issuing Clients prior to granting consent for the execution of any allocation/placement services. The policy sets out relevant information available about the proposed allocation methodology for the issue

- 5.8. PI has a centralized procedure in place to identify all subscription and placement operations and records such information, including the date on which PI is informed of potential subscription and placement operations. Records of subscription and placement decisions adopted about individual operations are kept in order to provide a full control record of movements in Clients' accounts and instructions received by PI. Each Client shall receive a clear justification and record of the final allocation. PI will submit a full control record of all major steps taken in subscriptions and allocations at the NBS's request.

## **ARTICLE 6 - BAN ON MARKET MANIPULATION**

- 6.1. For the purposes of these internal rules, Market Manipulation includes the following activities:
- a) Concluding of transactions, placing of orders to trade or any other actions that:
    - i) gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of a financial instrument or a related spot commodity contract or an auctioned product based on emission allowances; or
    - ii) secures, or is likely to secure, the price of one or several financial instruments, a related spot commodity contract or an auctioned product based on emission allowances at an abnormal or artificial level, unless the person entering into a transaction, placing an order to trade or engaging in any other behavior establishes that such a transaction, order or behavior has been carried out for legitimate reasons, and comply with accepted market practice;
  - b) Entering into a transaction, placing an order to trade or any other activity or behavior which affects or is likely to affect the price of one or several financial instruments, a related spot commodity contract or an auctioned product based on emission allowances, which employs a fictitious device or any other form of deception or contrivance;
  - c) Disseminating information through the media, including the Internet or by any other means, that gives or is likely to give incorrect or misleading signals regarding the supply, demand or price of a financial instrument, a related commodity spot contract, or an auctioned product based on emission allowances, or which hedges or is likely to hedge the price of one or more financial instruments, a related commodity spot contract or an auctioned product based on emission allowances at an unnatural or artificial level, including spreading unconfirmed news when the person spreading the

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information knew or should have known that the information is false or misleading;

- d) Transmitting false or misleading information or providing false or misleading inputs in relation to a benchmark where the person who made the transmission or provided the input knew or ought to have known that it was false or misleading, or any other behavior which manipulates the calculation of a benchmark.

6.2. In addition, Market Manipulation also includes the following behavior:

- a) Conduct by a person, or persons acting in collaboration, to secure a dominant position over the supply of or demand for a financial instrument, related spot commodity contracts or auctioned products based on emission allowances which has, or is likely to have, the effect of fixing, directly or indirectly, purchase or sale prices or creates, or is likely to create, other unfair trading conditions;
- b) Buying or selling financial instruments at the opening or closing of the market which has or is likely to have the effect of misleading investors acting on the quoted prices displayed, including opening or closing prices;
- c) Placing of orders to a trading venue, including any cancellation or modification thereof, by any available means of trading, including by electronic means, such as algorithmic and high-frequency trading strategies, and which through the following has one of the effects referred to in Clause 1(a) or (b):
  - i) By disrupting or delaying the functioning of the trading system of the trading venue or being likely to do so;
  - ii) By making it more difficult for other persons to identify genuine orders on the trading system of the trading venue or being likely to do so, including by entering orders which result in the overloading or destabilization of the order book; or
  - iii) By creating or being likely to create a false or misleading signal about the supply of, or demand for, or price of, a financial instrument, in particular by entering orders to initiate or exacerbate a trend;
- d) By taking advantage of occasional or regular access to the traditional or electronic media to voice an opinion about a financial instrument, related spot commodity contract or an auctioned product based on emission allowances (or indirectly about its issuer) while having previously taken positions on that financial instrument, a related spot commodity contract or an auctioned product based on emission allowances and profiting subsequently from the impact of the opinions voiced on the price of that instrument, related spot commodity contract or an auctioned product based on emission allowances, without having simultaneously disclosed that conflict of interest to the public in a proper and effective way;

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- e) By buying or selling on the secondary market of emission allowances or related derivatives prior to the auction held pursuant to Regulation (EU) No 1031/2010 with the effect of fixing the auction clearing price for the auctioned products at an abnormal or artificial level or misleading bidders bidding in the auctions.
- 6.3. For the purposes of Clause 6.1. (a) and (b) and without prejudice to the forms of behavior specified in Clause 6.1., Annex I to Regulation (EU) No 596/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC contains a non-exhaustive list of indicators relating to the employment of a fictitious device or any other form of deception or contrivance, and a non-exhaustive list of indicators related to false or misleading signals and to price securing.
- 6.4. Where the person referred to in this Article is a legal person, this Article shall also apply, in accordance with national law, to the natural persons who participate in the decision to carry out activities for the account of the legal person concerned.
- 6.5. Market manipulation is prohibited.

#### **ARTICLE 7 – RULES REGARDING CONFIDENTIAL INFORMATION**

- 7.1. All company employees, members of the statutory and supervisory body, as well as Insiders who have access to Confidential Information, observe and maintain effective measures, systems and procedures for detecting and reporting suspicious instructions and transactions listed in these internal rules.
- 7.2. The Company's CEO will compile a list of all persons with access to Confidential Information and those either employed by them under a contract, or who otherwise perform tasks for them and thereby have access to Confidential Information such as consultants, accountants and credit rating agencies (list of persons possessing Confidential Information) and will immediately update the list in the event of a change.
- 7.3. Each person listed on the list of persons in possession of Confidential Information shall confirm in writing to the CEO that they are aware of the relevant legal and regulatory obligations and the sanctions applicable to insider trading and unauthorized disclosure of Confidential Information. The list of persons possessing Confidential Information includes the identity of each person who has access thereto, the reason for which the person is included in the list of persons possessing Confidential Information, the date and time that person gained access thereto, and the date the list of persons with access to Confidential Information was drawn up.

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7.4. The CEO shall retain the list of persons possessing Confidential Information for at least five years after it has been compiled or updated.

## **ARTICLE 8 - POVINNOSŤ CONFIDENTIALITY**

- 8.1 All company employees, members of the statutory and supervisory bodies who receive Confidential Information are obliged to treat it as confidential.
- 8.2 The obligation of confidentiality survives the end of employment or contracted performance of all staff, and members of the statutory and supervisory bodies.
- 8.3 Disclosure to the people or institutions below shall not be deemed a breach of confidentiality:
- a) Persons appointed to supervise activities;
  - b) Courts;
  - c) Law enforcement in criminal proceedings;
  - d) National Bank of Slovakia for supervision purposes;
  - e) Criminal Police Service and Financial Police Service of the Police Corps to fulfil roles delegated to it under a special act;
  - f) Tax authorities in tax proceeding purposes;
  - g) Office for Personal Data Protection;
  - h) Slovak Intelligence Service for the purposes of powers vested in it by special legislation,
    - i) Military Intelligence Service for the purposes of powers vested in it by special legislation,
  - j) the competent authority of the Slovak Republic in order to fulfil reporting obligations under special legislation,
  - k) National Security Authority for the purposes of security clearance under special legislation. The above is without prejudice to the statutory obligation to contravene or report a crime.

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**ARTICLE 9 - REPORTING OBLIGATION**

- 9.1 Any person acting in accordance with their job description or function, or in connection with the performance of their duties when they are trading in financial instruments at PI, who has a reasonable suspicion that the execution of a trade could be considered insider trading or market manipulation is obliged to report it without undue delay to the Compliance Officer and the National Bank of Slovakia (NBS), using the e-mail address stor@nbs.sk that has been established to receive STOR reports.
- 9.2 A report under sub-clause 9.1 shall be submitted with the STOR template annexed to Commission Delegated Regulation (EU) 2016/957 of 9 March 2016 supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the appropriate arrangements, systems and procedures, as well as notification templates to be used for preventing, detecting and reporting abusive practices or for suspicious orders or transactions. The STOR template identifies the particulars that must be provided to ensure proper reporting of suspicious orders and transactions.

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