

Sales & Customer Relationship Managers

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General Principles of Communication with Clients

All communication with clients shall be fair, clear and not misleading and the information shall be presented in a way that is likely to be understood by the average member of the group to whom it is directed or by whom it is likely to be received.

The staff shall at all times act honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial markets.

It is strictly prohibited to use any aliases. The staff shall always present themselves with correct and valid credentials with reference to their position (e.g. the staff shall not present themselves as analysts, traders etc.), when communicating with clients.

While providing information to clients, all employees shall ensure that information to a client:

- i. includes the name of the Company;
- ii. does not disguise, diminish or obscure important items, statements or warning;
- iii. does not reference potential benefits without a fair and prominent indication of relevant risks;
- iv. is factually correct and provided in plain language;
- v. is accurate and up-to-date, taking account of the communication method used;
- vi. is consistently presented in the same language throughout all client facing material;
- vii. observe proper standards of market conduct.

All Employees can use the telephone lines which are recorded and easily extracted in order for the Company to monitor the conversations.

The employees can also use durable medium as a form of communication. In respect to that a durable medium need to:

- i. Allow information to be addressed personally to the recipient.
- ii. Enable the recipient to store information in a way that is accessible for future reference and for a period of time adequate for the purposes of the information
- iii. Allow the unchanged reproduction of the information stored.

The staff is strictly prohibited to use any means of communication such as:

- i. WhatsApp
- ii. Skype
- iii. Viber
- iv. Facebook Messenger

All relevant Employees are obliged to comply with these Sales & Customer Relationship Managers - General Principles of Communication with Clients, both in letter and spirit.

A violation of the Sales & Customer Relationship Managers - General Principles of Communication with Clients may result in a mandatory disciplinary action as per the Section 2.2 of the Disciplinary Policy and Procedure that consists of the three (3) Types:

Type 1: 1st Written Warning and 0-100% of variable deduction

Type 2: 2nd Written Warning and 0-100% of variable deduction

Type 3: Dismissal

Internal Register: Not for distribution

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