

## Compliance: Internal codes of conduct

Training program SAM

Title / Topic	Internal codes of conduct
Target audience	Asset managers
Learning content	<p>The topic of Codes of conduct within compliance explains central guidelines and instructions on how employees behave correctly in different circumstances in day-to-day bank practice.</p> <p>It includes, in particular, rules on employee transactions, handling of gifts and benefits, conduct guidelines in case of conflicts of interest as well as the handling of client relationships which could damage the bank's reputation.</p>
Learning location / Testing location	Fintelligence Online Lernplattform: <a href="https://fintelligence.fintelligence-net.com/">https://fintelligence.fintelligence-net.com/</a>
Learning time	<ol style="list-style-type: none"> <li>1. Employee transactions (50 min)</li> <li>2. Gifts (30 min)</li> <li>3. Reputation risks (20 min)</li> <li>4. Conflicts of interest (30 min)</li> <li>5. Learning control (60 min)</li> </ol>
Period	2 months
Learning goals	<p><u>Employee transactions</u></p> <p>Upon completion of this module,</p> <ul style="list-style-type: none"> <li>• you will be aware of the importance of fair and transparent codes of conduct for the equal treatment of all market participants,</li> <li>• you will understand the proprietary business of employees and the duties as well as constraints that are associated with it,</li> <li>• in particular, you will know how to behave if you come to learn about insider information,</li> <li>• you will recognise the various types of illegal market manipulation.</li> </ul> <p><u>Gifts</u></p> <p>Upon completion of this module,</p> <ul style="list-style-type: none"> <li>• you will understand what constitutes a gift and how to distinguish different kinds of gifts in this context,</li> <li>• you will know how to proceed if gifts or privileges are offered to you,</li> <li>• you will know the guidelines for dealing with inappropriate gifts,</li> </ul>

	<ul style="list-style-type: none"> <li>• you will know how you may give gifts and in which situations.</li> </ul> <p><u>Reputation risks</u></p> <p>Upon completion of this module,</p> <ul style="list-style-type: none"> <li>• you will be sensitised to particular types of customer relationships which have the ability to harm the bank's good reputation,</li> <li>• you will recognise customer relationships that are detrimental to the bank's reputation,</li> <li>• you will know what measures need to be taken should a reputation risk arise in a particular situation.</li> </ul> <p><u>Conflicts of interest</u></p> <p>Upon completion of this module,</p> <ul style="list-style-type: none"> <li>• you will be aware of the fact that you, as an employee, cannot simultaneously represent the contradictory interests of different parties,</li> <li>• you will know your obligations towards the bank as an employer if you intend to engage in non-business activities,</li> <li>• you will be particularly aware of the reporting and approval requirements for public activities, private mandates and sideline activities,</li> <li>• you will know what measures need be taken if a conflict of interest occurs in a particular situation.</li> </ul>
Method	Individual study via interactive e-learning module with discoverable content and videos plus final learning control via online test.
Learning control	Your online self-control test consists of 15 to 20 multiple choice questions. You will pass the test if you reach at least 70% of the maximum score.