Compliance: Internal codes of conduct & Data security and confidentiality

Training program SAM

Title / Topic	Internal codes of conduct & Data security and confidentiality
Target audience	Asset managers
Learning content	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. 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. The topic of data security and confidentiality explains key principles and guidelines for dealing with data and information. In particular, it covers the instructions for the classification of information, the handling of data and the use of electronic devices.
Learning location / Testing location	Fintelligence Online Lernplattform: https://fintelligence.fintelligence-net.com/
Learning time	Codes of conduct 1. Employee transactions (50 min) 2. Gifts (30 min) 3. Reputation risks (20 min) 4. Conflicts of interest (30 min) 5. Learning control (60 min) Data security and confidentiality 6. Data security (30 min) 7. Confidentiality (30 min) 8. Learning control (60 min)
Period	2 months

Learning goals	Codes of conduct E
	mployee transactions
	Upon completion of this module,
	• you will be aware of the importance of fair and transparent codes of conduct for the equal treatment of all market participants,
	• you will understand the proprietary business of employees and the duties as well as constraints that are associated with it,
	• in particular, you will know how to behave if you come to learn about insider information,
	• you will recognise the various types of illegal market manipulation.
	Gifts
	Upon completion of this module,
	• you will understand what constitutes a gift and how to distinguish different kinds of gifts in this context,
	• you will know how to proceed if gifts or privileges are offered to you,
	• you will know the guidelines for dealing with inappropriate gifts,
	• you will know how you may give gifts and in which situations.
	Reputation risks
	Upon completion of this module,
	• you will be sensitised to particular types of customer relationships which have the ability to harm the bank's good reputation,
	• you will recognise customer relationships that are detrimental to the bank's reputation,
	• you will know what measures need to be taken should a reputation risk arise in a particular situation.
	Conflicts of interest
	Upon completion of this module,
	• you will be aware of the fact that you, as an employee, cannot simultaneously represent the contradictory interests of different parties,
	• you will know your obligations towards the bank as an employer if you intend to engage in non-business activities,
	• you will be particularly aware of the reporting and approval requirements for public activities, private mandates and sideline activities,
	• you will know what measures need be taken if a conflict of interest occurs in a

particular situation.

Data security and confidentiality

Data security

After studying this module, you will

- have been sensitized to the correct handling of information and data,
- be familiar with the classification of information, and will know how to proceed in each case,
- know how to deal properly with devices that allow information exchange between you and others (such as the Internet and email).

Confidentiality

Upon completion of this module,

- you will understand the importance and principles of confidentiality,
- you will know the essential measures to protect confidentiality,
- you will be aware of the key principles of data security, bank-client confidentiality and commercial secrecy or information protected by copyright,
- you will know the rules of confidentiality in the context of offshoring and outsourcing.

Method	Individual study via interactive e-learning module with discoverable content and videos plus final learning control via online test.
Learning control	The two online self-control tests consist of 15 to 20 multiple choice questions. You will pass the tests if you reach at least 70% of the maximum score.