

# Information for clients and potential clients on the rules of providing investment services



## Article I Legislative Framework

In accordance with both the Slovak and European legislation – MiFID II, **International Investment Platform**, o.c.p., a.s. (hereinafter referred to as the “**Broker**”) has implemented new procedures to provide you with a higher level of protection when using investment products and services, while ensuring better professional care by the Broker and minimizing risks in making decisions when investing in structured products, unit certificates, other securities and financial instruments, taking into account your needs, knowledge and experience.

The regulation of MiFID II investment services was adopted with the aim of increasing investor protection and ensuring trading transparency. Its main objective is to strengthen the existing legal framework and to introduce a European single rulebook applicable to investment services and investment activities, together with ancillary investment services. MiFID II extends the range of financial instruments and also takes into account technical progress in investment trading. The MiFID II rulebook entered into force on 3 January 2018.

MiFID I legislation contained in Directive 2004/39/EC of the European Parliament and of the Council of 21 April 2004 on markets in financial instruments amending Council Directives 85/611/EEC and 93/6/EEC and Directive 2000/12/EC of the European Parliament and of the Council and repealing Council Directive 93/22/EEC (hereinafter referred to as “**MiFID I**”) has undergone several amendments since its entry into force. Eventually, these amendments led to the adoption of new legislation referred to as MiFID II.

From a legislative and technical point of view, the process of revising the legislation contained in MiFID I led to the adoption of a regulation as well as a directive. The directive as a legislative instrument was chosen with the aim of ensuring the approximation of laws in the individual EU Member States in this area. It concerns Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (hereinafter referred to as “**MiFID II**”). The second part of the new legislation consists of Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (hereinafter referred to as “**MiFIR**”). The regulator’s intention behind the regulation as a legislative instrument was to harmonise the issues contained in MiFIR equally and without derogations in all EU Member States. In practice, MiFID II and MiFIR are collectively referred to as the MiFID II.

The provisions of MiFID II are directly transposed into our Slovak legal system through an amendment to Act No. 566/2001 Coll. on Securities and Investment Services and on Amendments to Certain Laws, as amended, effective from 3 January 2018 (hereinafter referred to as the “**Securities Act**”).

## Article II Basic Information about the Broker

### Name and registered office of Broker:

International Investment Platform, o.c.p., a.s.

Einsteinova 24

851 01 Bratislava

Slovakia

Company ID: 35 771 80

The Companies Register of the District Court Bratislava I, Section: Sa, insert No. 4532/B

### Mailing address and address of the head office:

International Investment Platform, o.c.p., a.s.

Aupark Tower, Einsteinova 24

851 01 Bratislava

Slovakia

### Contacts:

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e-mail: [contact@iiplt.com](mailto:contact@iiplt.com)

### License:

The Broker is entitled to provide investment services and ancillary services pursuant to the Securities Act in accordance with Decision of the National Bank of Slovakia No. OPK-12778-2/2008 of 19 December 2008, which entered into force on 19 December 2008, and pursuant to Decision of the National Bank of Slovakia, file No. NBS1-000-045-005, ref. No.: 100-000-220-311 of 9 March 2020, which entered into force on 1 April 2020, to the following extent:

- acceptance and forwarding of the Client’s instruction concerning one or more financial instruments in relation to financial instruments:
  - a) transferable securities,
  - b) investment certificates or securities issued by foreign undertakings for collective investment,
- execution of Client’s instruction to his account in relation to financial instruments:
  - a) transferable securities,
  - b) investment certificates or securities issued by foreign undertakings for collective investment
- portfolio management in relation to financial instruments:
  - a) transferable securities,
  - b) investment certificates or securities issued by foreign undertakings for collective investment,
- investment consulting in relation to financial instruments:
  - a) transferable securities,
  - b) investment certificates or securities issued by foreign undertakings for collective investment,
- custody and management of financial instruments on the account of the client, including the holder management and related services, especially the management of funds and financial guarantee in relation to financial instruments:
  - a) transferable securities,
  - b) investment certificates or securities issued by foreign undertakings for collective investment,
- execution of an investment research and financial analyses or another form of general recommendation related to trading with financial instruments
- carrying out foreign exchange transactions, if these are related to the provision of investment services.

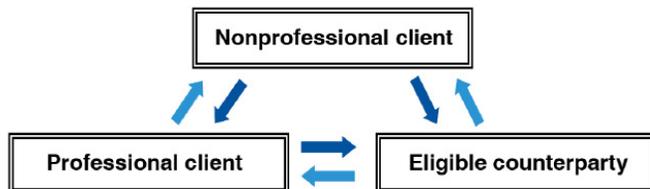
### Communication:

A client can use Slovak or Czech language in commercial relations with Broker. In individual cases, if the client and Broker agree, the use of English language in commercial relations is also possible. The form and the terms of communication are also subject to an agreement between Broker and a client, whereby apart from personal communication, communication via mail or by means of electronic communication media (fax, telex, email or other electronic media) is also possible in certain cases.

### Article III Mandatory categorization of clients

By law, Broker distinguishes a Nonprofessional client, a Professional client and an Eligible counterparty. Depending on the category, the Securities Act defines the scope and content of information that the Broker is obliged to provide to the client before executing any transactions using financial instruments. By law, someone who is categorized as a non-professional client is considered a client with the highest level of protection.

The client has the right to request a change of categorization if requesting a higher or lower level of protection than assigned to the client by the Broker based on the principles of categorization. The client will be reassigned to a category with a higher or lower level of protection upon request. The change of categorization to a non-professional client will be made in writing. A client will only be reassigned to a lower level of protection if meeting the legal requirements. Therefore, a client with a higher level of protection may be reassigned to a category with a lower level of protection on the basis of his/her request and after meeting the conditions stipulated by law. Vice versa, a client with a lower level of protection may be reassigned to a category with a higher level of protection on the basis of his/her request. All clients of the Broker are included in the category of non-professional clients, unless a contract with the client explicitly stipulates assignment to another category.



Pursuant to Section 73u (2) of the Securities Act, an eligible counterparty is a client who belongs to one of the following types: a securities broker, a credit institution, an insurance company, a management company, etc.

Pursuant to Section 8a (2) of the Securities Act, a professional client is a client who has the expertise, experience and knowledge to make his/her own investment decisions and to properly assess the risks associated with such decisions. It is primarily a securities broker, a financial institution and a large trading company whose assets exceed EUR 20 million, net annual turnover exceeds EUR 40 million and own resources exceed EUR 2 million, where at least two of these conditions are met.

Pursuant to Section 8a of the Securities Act, a non-professional client is a client who does not meet the statutory criteria to be classified as a professional client or eligible counterparty when providing an investment product or service.

The Broker informs clients, who invest their funds in financial instruments on their categorization by a letter, an information brochure or a concluded contract. The Broker introduced client categorization based on the requirements of the Securities Act, in the internal directive "Rules for Client Categorization".

Broker shall not be eligible to provide you with a financial instrument which does not correspondent with your classification, unless you specifically request it.

If you are applying for providing of a portfolio management investment service, Broker shall not be eligible for providing you with these services without determining the listed information.

The Broker introduced the principles of the respective client testing based on the requirements of the Securities Act, in the internal directive "Rules for Contact with the Client and Potential Client".

### Article V Strategy of execution and forwarding of investment instruction

The objective of execution and progress strategy of the instruction is to assure the co-called "best possible result" of the executed investment instruction. By means of the law, MiFID II directive imposes an obligation of performing a feedback test of principle compliance of the best possible result.

Strategy of instruction execution and forwarding defines purchase and sale of financial instruments by clients. Broker executes client's instructions in terms of a commission contract or a mandate contract, usually by providing business on clients account. The client's instruction can be forwarded to organized markets or it can be executed beyond the organized market.

To execute client's instructions, Broker performs a set of interrelated measures, pursuant to which it performs the client's instruction execution and forwarding with the objective to reach the best possible result for the client under given circumstances. Despite this effort, Broker is not able to guarantee the best possible result for the client resulting from instruction execution at each individual instruction.

#### Back check

Broker monitors efficiency of the strategy and the measures resulting from it for the purposes of identification and rectification of the drawbacks. At least once a year Broker evaluates efficiency of the strategy, namely if the covered places of instruction execution enable the client to reach the best possible result. Broker informs the client about all important changes of the strategy in the way agreed in the contractual relation with the client.

#### Executing client's instruction

If the client wishes to execute or forward the instruction pursuant to the terms and conditions defined by him (a specific instruction of the client), Broker shall observe these. In such case the instruction performance in compliance with a specific instruction is considered the performance of the obligation to reach the best possible result for the client.

If the place of instruction execution is not chosen by the client, the price and fees represent the primary factors of evaluation of the best possible result from executing client's instruction, while out of these two factors the price is more relevant because it is the main part of total payment.

If the place of instruction execution is not chosen by the client and all the places of instruction execution have comparably favourable conditions, the decisive factor is speed and probability of instruction execution. These are increasing with the increase of the given market liquidity.

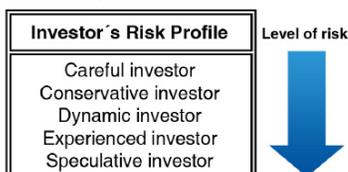
When assessing the best possible result, the following is also considered:

- characteristic of the place of execution, where the instruction can be forwarded
- characteristic of the client inclusive his category
- nature of the client's instruction
- characteristic of financial instruments which are the subject of this instruction

### Article IV

#### Testing of the client's suitability and appropriateness to execute an investment objective into a financial instrument

By taking the suitability and appropriateness test, Broker shall determine the level of your knowledge and experience in the field of investing into financial instruments, the volume of financial resources assigned for investment and investment goals, and shall also find out your risk profile determining which group of financial instruments is suitable for you.



#### Equities:

If equity is registered only on one organized market, Broker will move the instruction to this market. If equity is registered on several organized markets, the client has the option to choose the market onto which it is possible to forward their instruction while Broker shall forward the instruction to the market defined by the client. If Broker is not a member of this market, it will forward the instruction to a selected broker who will execute the instruction. Instructions related to equities which have their domestic stock exchange overseas and at the same time these equities are registered on a different overseas or European stock exchange, Broker shall forward the instruction to one of these markets.

#### Bonds:

The majority of bonds are registered on the organized market; nevertheless Broker can execute instruction through OTC market if it is not able to assure the best possible result on the organized market. The price of bonds will be set by the situation on the market.

#### Other financial instruments traded on the organized market:

Broker shall forward the instruction to be executed to the organized market, to which it has access and where it can provide for the best result of instruction execution for the client, or it will forward the instruction to a selected broker, if it does not have access to a particular market.

#### Information on place of investment service execution

List of selected capitals of investment services execution for trading of financial instruments

Financial instrument	Place of business
Equities	Saxo Bank KBL European Private Bankers
Bonds	Trident Trust Luxembourg KBL European Private Bankers
Investment certificates	Trident Trust Luxembourg Allfunds Bank International Moventum S.C.A. Trident Trust Guernsey KBL European Private Bankers

The Broker introduced the rules for the execution of client orders based on the requirements of the Securities Act, in the internal directive "Order Execution Strategy".

### Article VI

#### Information on financial instruments and associated risks

The financial instruments regulated by the directive MiFID II which Broker trades with are as follows:

- Equity
- Bonds and
- Investment certificates.

Equity (share) Is a substitutable security representing a share on the basic capital of a company, which is connected with the right of its owner to participate in company's management, in its profit and in its liquidation balance.

Bond Is a security where its owner is entitled to demand redemption of the outstanding item at a face value and payment of revenues to a set date and an obligation of the person eligible to issue bonds to meet this obligation.

Investment certificate Is a security, which is connected with the rights of its owner (a shareholder) to a corresponding share of property in an investment fund and the right to share the earnings of this property.

Return and possible profit on each investment depend on the risk connected with this investment. A potentially higher risk is connected with a lower probability of a return on investment. Irrational behaviour of investors and analysts and unpredictable random events can influence the trend of price as well as the return on investment and the profitability of an investment.

The amount of risk depends on the period of the investment.

Previous price development shall not be a guarantee of the same trend in future and the attained profit in the past does not guarantee attainment of a profit in future.

Investing funds in different types of assets within the investment portfolio can reduce the risk of the return on funds invested in this way.

Broker does not recommend investing funds gained from a granted credit due to the reason that earnings can be usually gained only with a higher risk and this profit is considerably reduced by credit interest.

The client is fully responsible for accurate tax payments with respect to his investments. Broker does not offer consulting services on taxation of earnings.

When investing in such a type of assets (especially securities) the trading of which is not frequent or they are traded in big volumes, or their trading does not take place on the organized market, the trade can be impracticable for the client in the period he determines, or the price can be unprofitable in the period the client determines.

Risk of instruction execution for purchase, instruction for sale or statements depends on the terms specified in the instruction or statement which, from case to case, can but don't have to conform to the terms of an organized market while the terms in organized markets are diverse and can change.

Risk of a change in the exchange rate of a foreign currency by investing in assets denominated in foreign currencies is not only connected with investments returnable in these foreign currencies, but also with assets denominated in foreign currencies and traded in domestic currency because the price development usually depends on the change of the exchange rate of a currency in which they are denominated.

To have a lower level of reliability to fulfil own obligations (rating) means to pay a higher interest on obtained funds. Only debt securities have higher returns than the returns from the granted funds on money market (i. e. such that imply the right to a certain monetary payment in a certain time period) with a higher risk of returns funds.

The price of debt securities does not only depend on the height of the claim on their return or on economic results of their issuer, but also on the trend of interest rates and on the tendency of the market where they are traded.

If a debtor (issuer) becomes insolvent, then funds invested in debt securities issued by him can become partially or totally irrecoverable, and can mean an economic loss for the investor.

The price development does not only depend on economic results of a company, but also on the course of events and the tendency of the market where equities are traded. If a company becomes insolvent, funds invested in equities issued by it can become partially or totally irrecoverable, and mean an economic loss for the investor.

Risk of investing funds into investment certificates of investment funds is in the possibility of their redemption and in the investment strategy of the fund, i. e. in what the fund can invest (e.g. only debt assets payable within 1 year, only bonds, only equities, only investment certificates of other funds, different combinations). In case of investment certificates of an open-end fund managed by an asset management company in Slovakia the owner has a legal right to their redemption towards the asset management company which has issued the investment certificates.

Prearranged future fulfilment within an agreed time period at a prearranged price or interest means a risk that in future at the agreed time it will be possible to reach a by far better price or interest for the same business which shall mean a loss business considering the obligation of fulfilment at a prearranged price. The difference between the price or the future interest and prearranged price or interest can reach unlimited height, i. e. height of a possible loss from a prearranged future fulfilment within an agreed time period at a prearranged price or interest is unlimited.

Investment of funds in rights (options) with a prearranged time of their vain lapse, namely rights to prearranged future fulfilment, within an agreed time period, at a prearranged price or interest, means a risk of a loss up to the height of funds invested in this way. Provision of this right (option) means a risk of a possible loss at unlimited height. Risk of a proper and early exercise of this right (option) is borne in full by the client.

Risks connected with a financial instrument consisting of two or more financial instruments or services can be higher than risks connected only to some of these financial instruments.

A client is aware of the fact that he has to take into account possible changes of the exchange rate, by provision of funds in a foreign currency and by currency conversion.

For some financial instruments, the execution of the client's instruction for their purchase can be conditioned by their composition and maintaining of guarantee in an amount which does not depend only on the decision of Broker.

### **Article VII Tied controlled Agents**

The Broker does not use tied controlled agents by provision of investment services and of secondary services.

### **Article VIII Information on protection of financial instruments or funds entrusted to Broker**

#### **Client's assets entrusted to Broker**

Broker registers financial instruments of the client separately from its own financial instruments and from financial instruments of third parties. Broker is entitled to deposit financial instruments of its clients on an account or accounts of third parties.

#### **Securities purchased on the domestic market**

Client's securities purchased on the Slovak market are generally registered on a specific account of the securities holder, administrated for the client by a member of the Central Securities Depository, according to an agreement between Broker and the client. In case of provision of the holder management service, securities can be registered on the holder account.

#### **Securities purchased on the foreign market**

Client's securities purchased on the foreign market are registered with the foreign custodian chosen by Broker on clients' clearing accounts.

Broker minimizes the risk of a temporary unavailability of client's securities as a possible risk of the registration of the client's securities in foreign custodians on clearing accounts by a frequent data backup and by use of applications and hardware from renowned providers, what makes a complete or a partial loss of records very unlikely. Broker takes full responsibility for a potential unavailability of client's securities, if this were caused by an unauthorized handling with these securities on Broker part. i.e. by reason of a technical failure or a failure of human factor.

Foreign custodian is chosen from among renowned banks operating on a particular foreign market, while Broker's selection is based especially on the range, the quality and the price of custodian services offered to its clients, the way of doing business and its settlement, the level of legal protection of clients property, market customs in a particular country and other criteria based on which it is possible to evaluate the level of the provided services and client's property protection.

Broker also secures protection of assets of clients by means of contract provisions made with foreign custodians.

The securities of the clients are kept at the foreign custodian on an individual account identifiable through a special designation, what ensures the separation of the property of the clients from the own property of Broker.

Unless otherwise agreed between the client and Broker, Broker is accountable to its clients for performance and neglecting of a third party – the custodian by services provided for clients, or for its consequences in case of its insolvency.

The registration of securities abroad is governed by the legal regulation of particular country.

### **Article IX Information on Guarantee Investment Fund**

Financial instruments entrusted to Broker clients are protected by a protection system through the Guaranteed Investment Fund in terms of The Securities Act, while information on terms and conditions of the protection of clients in terms of The Securities Act is posted on the website [www.iiplt.com](http://www.iiplt.com).

### **Article X Portfolio management**

Within the license of a securities broker, Broker provides the investment service of portfolio management to its clients. In terms of The Securities Act, portfolio management is defined as management of financial instruments portfolio in compliance with authorisations conferred by clients based on the manager's free discretion. According to the Agreement on portfolio management, Broker acquires full mandate from the client to manage entrusted financial assets pursuant to the agreed investment strategy which was chosen based on the investment profile of the client. The client leaves the investment decision to Broker. Broker manages client's portfolio without consulting the client; it can buy, sell or otherwise trade the investment instruments within the portfolio.

#### **Portfolio**

Client's portfolio is understood as asset formed by investment instruments, other securities or funds intended to a purchase of investment instruments or other securities which Broker is entitled to manage in line with the Agreement on portfolio management.

Trades of financial instruments are executed on regulated and on uncontrolled securities markets.

Broker is authorised to cooperate, possibly to perform any activities within the portfolio management through any securities broker or another entity with a similar position.

Within the performance of the individual portfolio management, it is possible to acquire the following financial instruments:

- transferable securities,
- equities,
- bonds,
- other securities, connected to the right to acquire equities or bonds, or which allow settlement in cash,

- investment certificates or securities issued by foreign undertakings of collective investment,

### **Methodology and frequency of portfolio evaluation**

Financial instruments in a portfolio are evaluated on a daily bases. The following methods are used for evaluation of financial instruments:

- Shares issued by units of collective investment other than the closed type are evaluated by the last known current value of the net assets falling on one share published by the administrator, or more precisely by the administrator of a unit of collective investment;
- Funds are evaluated at face value;
- The official exchange rate of the National Bank of Slovakia, or of the European Central Bank effective on the day of evaluation is used for conversion of currency of financial instruments denominated in other currencies than the reference currency of the portfolio and of monetary accounts balances handled in a different currency than the reference currency

After evaluation of the portfolio value, it is possible to calculate the portfolio performance. To determine the time period for calculation of the performance the actual number of days can be also replaced by the number of weeks, while 4 weeks mean 1 month, 13 weeks 3 months, 26 weeks 6 months, 52 weeks mean 1 year and multiples of 52 weeks mean numbers of years. One week means 5 work days in a week. Weekly values are calculated from the values of the same day in a week (with the exception of holidays, when the value of the closest preceding work day is used). The daily performance of the portfolio is set as a share of the current value of the portfolio (reduced by possible deposits executed on that day) to the value of the portfolio from the previous day, expressed in percentage. The performance of the portfolio is calculated on a daily basis.

Expected performance of the portfolio represents a weighted expected performance of individual funds, while the weight is a relative share of the fund at a value of the whole portfolio. Portfolio risk is measured as annualized weekly volatility of the portfolio. The minimum and maximum performance represents the best and the worst expected performance with 95 % probability. The performance is cleared of managerial and custodian fees of individual funds.

Expected performance is not a reliable indicator of the performance in the future, and Broker does not guarantee its achievement.

Simulated historical performance comes out of the actual performance figures of the past but such a performance is not a reliable indicator of the performance in the future.

The objective of client's portfolio management is the assessment of clients' property by means of a suitable recommended strategy satisfying investment objectives of the client, by a level of risk corresponding to client's knowledge and experience in the field of investment and to the risk profile of the client. Broker manages client's portfolio in compliance with authorizations given by the client according to their own free consideration. The client leaves individual decisions about investment to Broker and Broker manages the portfolio of the client without consulting the client.

With regard to the risk profile of the client and based on performed clients' test, we can divide clients and their strategies into three groups

- a) client with a conservative risk profile - conservative investment strategy - this strategy is intended for investors who accept only a lower level of risk, prefer security, and at the same time want to evaluate their financial instruments better than by using current accounts or time deposits.
- b) client with a balanced risk profile - balanced investment strategy - this strategy is suitable for more experienced investors who want to reach an investment evaluation exceeding returns from bank deposits by a number of percent,
- c) client with a dynamic risk profile - dynamic investment strategy - this strategy is intended for investors with a higher level of experience who prefer high returns at a high level of risk.

A client can always select a more conservative investment strategy.

### **Article XI**

#### **Information on costs and related fees**

Costs and fees related to provision of investment services are listed in Service Charge List which is available for public inspection in the head office of Broker and on the website [www.iplt.com](http://www.iplt.com).

This costs and fees can be included also in different documents or pricelists which are part of the contractual documentation with the client.

Provision of investment services and trade with financial instruments can be connected with further costs, inclusive tax duties, which are not covered through Broker and therefore they are not charged to the Broker client.

### **Article XII**

#### **Providing reports to the client**

##### **Sending reports to the client**

Broker provides the client with adequate information on provided investment services, containing the requirements established by law, especially on costs related to business and services executed on client's account.

Such information is provided on a permanent media on the first business day after the execution of the instruction or if the branch received the confirmation from a third party, no later than the first day after the receipt of the confirmation from this party. Broker does not send information to clients, if the same information is provided to the client by a third party.

##### **Sending reports to the client on regularly executed instructions**

Broker sends the client information on his instructions at least once in 6 months if the instructions are carried out regularly and concern the investment certificates of open-end funds or securities of foreign undertakings of collective investment.

##### **Information on price by a partially executed instruction**

If the instruction is executed in parts, a notice is sent to the client containing information on the price of each part or on the average price, unless otherwise agreed between Broker and the client.

##### **Sending reports to clients on providing investment service of portfolio management**

Broker provides the clients with regular statements on a permanent media containing information on operations related to portfolio management, executed on the client's account while Broker sends statements to the client once in 6 months, unless otherwise agreed. Upon client's request, Broker delivers statements once in 3 months. If the Agreement on portfolio management allows management of the portfolio with leverage, Broker provides the client with a statement at least once a month.

Statements of financial instruments or more precisely of financial means held by Broker for the client are provided at least once a year, if such statement has not been already provided within a regular statement.

The statement contains information on all financial instruments or monetary instruments held by Broker for the client in connection with providing investment services at the end of the period to which the statement relates. If financial instruments or monetary instruments were subject of business consisted in financing of securities, so was the extent of this use and the return the client gained in this consequence.

### Article XIII

#### Information on remuneration, fees or commission accepted from a third party or provided to a third party

##### Information on remuneration accepted/provided by Broker

Based on a contractual agreement, Broker can accept commissions covered by business partners in relation to provision of an investment service to the client. Accepted commissions do not lower the quality of the provided service to the client and do not prevent Broker from fulfillment of the obligation to act in the interest of the client. These fees are used to improve and maintain the quality of provided services to the clients' benefit.

The accepted commissions are mainly commissions from asset management companies, foreign undertakings of collective investment, securities brokers, issuers of securities or other business partners, as remuneration for the support of liquidity of financial instruments issued or brokered by means of these undertakings. The amount of commissions received by Broker is in the amount of the agreed percentage of yearly fees charged by the undertakings of collective investment or in the amount of the agreed percentage of the volume of financial instruments issued by the issuer.

Based on clients' request, Broker will provide detailed and complete information concerning commissions accepted in relation to provision of an investment service to the client.

### Article XIV

#### Conflict of interests

Broker has applied rules on compliance to legal and moral standards and instructions to prevent occurrence of conflicts of interest.

Effective measures during a conflict of interests are mainly governed by:

- providing of an independent attitude of employees in relation to clients or to other contracted parties, so that any risk of influence or of conflict of interests is prevented,
- emphasis on professionalism and good moral character of employees in all circumstances and at all times in relation to Broker and to investment mediators or counterparties,
- separation of personal relationships of employees with Broker clients or business partners of Broker from work related activities,
- rules by execution of transactions by employees to their personal account,
- execution of speculative transactions by Broker employees beyond their work duties,

- following the internal regulations and procedures by every transaction of an employee and their execution by means of traditional channels of distribution intended for non-commercial subjects,
- prohibition of Broker employees to act in the name of clients or act in the name of a third party based on full power entrusted to Broker by the client,
- employee duties to ensure impartiality on questionable practices which could discredit Broker,
- ban or restriction of the possibility of other persons to inadequately influence the way in which respective Broker employees provide investment services, additional services or perform investment activities,
- prohibition of acceptance of gifts or other benefits offered by clients or contracted parties, that is beyond the standard business practice and exceeds the limit determined by law,
- compliance to the legal and moral frame in all operations of the Broker employees.

Broker avoids a conflict of interest on principle during its activity. In areas where such a conflict occurs, Broker manages it in form of provision of information, so that a fair handling is provided to all clients, and so that the interests of clients would not be harmed by means of compliance with adopted measures to maintain confidentiality and use of system of Chinese walls, a refusal to act as well as other ways. Broker employees are particular about the interest of Broker not being preferred over the interest of clients where a properly informed client expects that his/her interest will be preferred over the interests of Broker, and so that interests of one client where not preferred over the interest of another client. Internal documents of Broker consistently determinate the flow of confidential data within Broker, so that any possible abuse by any person was prevented.

Information on conflict of interests within this document according to the Business terms and conditions of International Investment Platform, o.c.p., a.s., for providing investment services is a part of the legal relation between the respective client and Broker. The client confirms the awareness of this information with a declaration in a relevant agreement.

All listed measures of Broker are monitored on a regular basis and their efficiency is evaluated.

*This information is providing solely for the purpose of informing the client, without any legal claims arising. All information contained in this document is stated on the website [www.iiplt.com](http://www.iiplt.com), where they are available to the clients all the time.*