Based on Article 66 Rules of Conduct of Investment companies when providing services ("Official Gazette of RS", No. 89/2011 and 44/2012), and Articles 47 and 48 of the Statute of SOCIETE GENERALE Banka Srbija AD, the Executive Board of SOCIETE GENERALE Banka Srbija, address Bulevar Zorana Đinđića 50a/b, 11070 Novi Beograd, on January 12th, 2016, adopted the following

Rules of Confidential Information
Investment Services Unit
(Hereinafter referred to as Authorized banks)

1. The basic terms

These rules define the documents and data (information) that constitute confidential information of the Authorized bank, which is especially regulates:
   a) the way of handling documents and data representing a confidential information,
   b) protection of confidential information,
   c) violation of confidential information and accountability.

1.1 Confidential information are considered all documents and data associated with operations of the Authorized bank, which is formally and not publicly disclosed, regardless of the sources and ways of coming into knowledge of them.

1.2 Data relating to the providing of investment services and additional services, which are considered as confidential information are:
   • Client information,
   • Information on the status and transactions in Client accounts,
   • Information about services provided to clients, placed orders and transactions concluded,
   • insider information about financial instruments or issuers, to which relevant persons received during the performance of tasks and activities outside of work,
   • other documents and information which the Authorized bank, as confidential, informs competent authority, companies, institutions, etc., if the person involved warned the Authorized bank that the data provided is confidential information,

1.3 Documents and information can be designated with different degrees of confidentiality (public, not confidential – NC, for internal use – C1, partially confidential – C2, confidential – C3):

2. Communication of confidential information

2.1 The Authorized bank shall not use, disclose to third parties or enable third parties use information that is considered confidential. Exchange of information relates to all forms of communication (meetings, phone calls, e-mails, distribution of minutes of the meeting ...).

2.1.1 The relevant persons are required to:
   o Information on clients,
   o information on the accounts and transactions of its clients,
   o Information on services provided to clients, the placed orders and concluded transactions,
Communicated / delivered personally to clients, based on previously performed personal identification, or to the address specified by the client in the concluded contract with the Authorized bank.

All obligations prescribed by this Rules relate to the managers and employees of the Authorized bank.

The information referred to in Section 2.1.1. of these Rules can be communicated/delivered to another persons and that the client authorizes to receive such information (agent/proxy of the client, person which the client listed to receive documents related to trading ....)

Verbally communication of information referred to in Section 2.1.1. of these Rules can only take place in the premises of the Authorized banks or branches of Societe Generale Banka Srbija (hereafter referred to as credit institution) on the basis of previously performed personal identification.

When reporting data and getting introduced to documents / records that are confidential, the relevant person are required to emphasize that such information or documents are identified as confidential and to warn persons to whom they communicated the obligation of professional secrecy and accountability in case of detection of the same.

2.2 Data that is considered a confidential can be made available and disclosed to third parties only:

- Based on a client’s written consent,
- at the request of a person authorized by the Securities Commission, the Central Registry or market operator in monitoring the legality of operations,
- under a court order,
- by order of an authority that deals with the prevention of money laundering or terrorist financing or other competent state authorities.

2.3 The obligation of keep confidential information even after stopping to perform a function, that is, termination of employment.

3. Storing data which represents a trade secret

3.1 Information to be considered a trade secret must be kept secure and not to be accessible to persons who do not need them or persons who should not have them.

Relevant persons who handle data as defined in these Rules as confidential shall be kept in a safe place and can not be disclosed without unauthorized nor given without any type of declaration regarding the said data.

3.2 The Authorized bank is obliged to adhere to the following rules:

- all paper documents are considered confidential in accordance with paragraph 1.2. these Rules should only be used in a safe environment,
- When not in use, the data marked as confidential, should be kept in a locked facility with access to that area controlled,
- electronic records should be kept in separate electronic records that are not available to those who do not need them (the document should be password protected)
- archives of Client files and executed transactions should be kept safe in separate locked cabinets and make unavailable for all for whom that information is not required.

3.3 Confidential documents are kept in such a manner that ensures confidentiality, in steel cabinets, desks if they are secure with special safety locks, they can be found on desks of employees only during the time until they are being used by them when working.

3.4 In the event of disclosure or loss of data or documents that are confidential, the responsible person must without delay inform the Head of the Authorized bank.
The Head of the Authorized bank shall without delay take the necessary measures to eliminate harmful impacts and determine the circumstances under which there has been a disclosure, or loss of data.

3.5 Violation of keeping confidential information, is not considered when:

- at meetings of the Management and Executive Boards of the credit institution, if such disclosure is necessary, provided that those present must be warned that the documents and information is considered confidential, with a duty to preserve it;
- the competent supervisory authorities of the credit institution, organs for inspection, investigative and judicial authorities, at their request, when the data must be given or can be disclosed based on regulations or authorizations arising from the function that the person do, or the position on which those persons are;
- competent authorities when reporting a crime, economic offenses or misdemeanors.


Rulebook of Confidential Information shall be published on the website of the Societe Generale bank: www.societegenerale.rs, the next working day from the date of receipt of the Decision of the Securities Commission on approval to the Authorized bank’s Code of Conduct whose this Policy is an integral part, and will be applied after a period of eight days from the date of its publication on the website.

President of the Executive Board
Maria Rousseva

Member of the Executive Board
Stanislas Tertrais