



## General information about investments (including execution policy)

The Austrian Securities Supervision Act (WAG) has been amended due to the European Markets in Financial Instruments Directive (MiFID II). By introducing MiFID II and implementing it into national law (the Austrian Securities Supervision Act), European and Austrian legislators are pursuing the following goals in particular:

- a) To create standardized competitive conditions for providers of financial services;
- b) To improve investor protection through increased transparency and even more detailed information.

The information provided here is intended to make the customer aware of circumstances that might be of relevance to his/her investment business with EURAM Bank. However, this information cannot replace the necessary contractual agreements.

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### **I. European American Investment Bank AG ('EURAM Bank')**

#### **1.) License**

EURAM Bank is licensed to provide banking services by the Austrian Financial Market Authority (FMA), Otto-Wagner-Platz 5, 1090 Vienna, Austria, and is entitled to carry out business with its customers in the field of investments and securities.

#### **2.) Communication with Euram Bank**

EURAM Bank communicates with its customers in German. In general, customers can contact EURAM Bank by phone, letter, fax or e-mail in addition to making a personal appointment.

However, unless agreed otherwise, legally significant correspondence between EURAM Bank and its customers is in writing and in German.

All electronic means of communication (telephone conversations, e-mail etc.) must be recorded. This applies to incoming and outgoing messages alike. Therefore, EURAM Bank is required to enter into a service agreement with the customer in order to do business electronically. EURAM Bank can determine which forms of electronic communication to provide.

The customer can request recordings for a period of at least five years.

#### **3.) Information about customer classification**

Financial institutions must classify their customers as private customers, business customers or eligible counterparties. As a rule, EURAM Bank classifies its customers as private customers (small investors) pursuant to the Austrian Securities Supervision Act.



Private customers are afforded the greatest possible level of protection by the Austrian Securities Supervision Act.

However, business customers and eligible counterparties can also demand to be treated as private customers (or business customers) at any time and in turn demand an increased level of protection. Businesses that meet the criteria to be classified as business customers can also request to be classified as eligible counterparties. Eligible counterparties are afforded the lowest level of protection by the Austrian Securities Supervision Act.

The appropriateness of financial products for the private customer is checked when the investment consultation starts (e.g. during an initial consultation) and as part of execution-only business that does not involve consultation.

## **II. Investment services of Euram Bank**

### **1.) Services**

EURAM Bank provides the following services in connection with investments and securities:

#### a) Customer advice

Analysis of the requirements of the customer (such as knowledge and experience, financial circumstances and investment goals) and recommendation of suitable products from EURAM Bank.

EURAM Bank has detailed information about these products such as the current management strategy for funds and can therefore provide its customers with detailed information about these products.

Besides detailed advice on its various own investment products, EURAM Bank is also able to provide its customers with general information about third-party products.

The investment strategy EURAM Bank proposes to its customers is based entirely on the individual situation of each customer and factors in their investment goals, financial circumstances and willingness to take risks. The investment strategy is adapted to the knowledge and experience of the customer. A consultation normally takes place as part of an initial interview.

#### b) Acquisition and sale of securities

EURAM Bank enables its customers to buy and sell investment products. Depending on the product, EURAM Bank itself acts as a buyer or seller or concludes the transaction desired by the customer with a third party and on the account of the customer, in which regard other partners often have to be involved as well and the customer order passed on to them.

#### c) Custodianship and management of securities including clearing account management

EURAM Bank holds securities for its customers and often engages professional custodians.

#### d) Asset management

EURAM Bank manages the assets of its customers in line with their instructions or at its own discretion, with consideration for the investment strategy based on the financial circumstances, knowledge, experience and investment goals of the customer. EURAM Bank provides its customers with tailored asset management concepts. Assets can be managed in funds of funds, individual funds, single-stock portfolios and special funds.



In this context, the customer orders and authorises EURAM Bank to invest the amount to be managed in line with an agreed investment strategy and without seeking instructions, i.e. at the discretion of EURAM Bank.

EURAM Bank uses the following valuation criteria to measure the financial instruments being managed in the portfolio of the customer:

- Mutual funds are normally measured at the share prices published by the investment company in question.
- The prices of listed securities are normally determined using the rates of the main trading centre for the stocks.
- If no stock exchange rate is available for financial instruments, EURAM Bank will attempt to determine the market price using general valuation benchmarks.
- Financial instruments in the customer portfolio are normally measured on banking days when a current rate is available, or no later than each reporting date.

## **2.) Investment information (risk information)**

A general description of the securities that might be the object of the services provided by EURAM Bank can be found in the basic information about securities and other capital investments including risk information that is or has been issued to the customer along with the safe custody agreement (opening documents) and this general information about investments. On request, EURAM Bank will personally provide the customer with further risk information on individual securities products, provided that the information is not already fully provided by the risk information.

If a customer wants EURAM Bank to provide information on a financial instrument for which a prospectus has been issued, the customer can request a copy of the prospectus from his/her customer advisor.

## **3.) Customer information**

Customers of EURAM Bank are notified of services that EURAM Bank can provide, including in connection with investments, on a continuous basis and with consideration for the relevant statutory regulations.

### **a) Statements**

In particular, statements for securities transactions are provided to the customer immediately, or no later than one business day after the completion of the customer order, in the way agreed with the customer.

### **b) Securities account statement**

Statements about the securities being managed for the customer are sent to the customer on a quarterly basis, unless agreed otherwise with the customer.

### **c) Special cases: leverage products and contingent liabilities**

With regard to leverage products and contingent liabilities contained in securities portfolios, the customer is also notified through an agreed channel if an instrument loses 10% of its value or a multiple thereof within one working day.

## **4.) Dependent advice model and relationship to product manufacturers**

EURAM Bank has close ties with Amundi Austria GmbH (as an investment company for the mutual fund managed by EURAM Bank). The mutual funds managed by EURAM Bank are predominantly



provided due to these close ties. This relationship between EURAM Bank and Amundi Austria GmbH means that EURAM Bank provides investment advice on a dependent basis. These products are mostly marketed by product manufacturers with close ties to EURAM Bank and are adapted and selected with full consideration for the goals and requirements of the customer, facilitating the best possible advice and investment.

## **5.) Disclosure Sustainability**

The EURAM Bank is aware of the increasing sustainability risks as well as climate risks and therefore acknowledges the necessity of including these factors to the consideration of the overall risk calculation.

Sustainability risks are required to be applied by participants of the financial market as well as financial advisors according to the principle of proportionality so that the size, internal organization, also the type, the extent and complexity of the transactions as well as the risk structure of EURAM Bank consider the determination of adequate methods, systems and processes in respect of dealing with sustainability risks.

In application of the above-mentioned principle of proportionality EURAM Bank has determined that for the time being sustainability risks will not be considered.

## **III. Execution of customer orders**

EURAM Bank forwards customer orders to trading partners (interim commissioners), whereby the quality of execution and processing are the main focus when selecting interim commissioners. In addition, the depository of the securities is also taken into account, which the combination of depository / interim commissioner can influence the execution of the order.

The selected interim commissioners are Wiener Privatbank SE and Baader Bank AG. Unless otherwise instructed by the customer, the customer orders are carried out on the basis of the implementation policy of the interim commissioners, whereby the trading partners undertake to carry out the orders as best as possible.

In the past, the elected interim commissioners have offered quick and reliable execution without any differences in quality having been ascertained in detail. The interim commissioners are regularly monitored on the basis of random checks of the execution quality.

However, EURAM Bank cannot guarantee that the best possible result will actually be achieved for each individual order.

Below you will see a breakdown of the key concepts of the execution policy of our trading partners.

The execution policy also prescribes execution venues (e.g. a stock exchange) for a certain category of customer orders. The specific execution venue is determined when the order is issued.

### **1.) Scope of application**

The execution policy applies to orders to buy or sell financial instruments.

The execution policy encompasses passing on the order to other intermediaries for the purpose of execution (simple commission) as well as the execution of the order by EURAM Bank itself (commission involving acting as principal).

The execution policy does not apply to purchase agreements between EURAM Bank and the customer (fixed-price transactions). In particular, a purchase agreement is concluded when EURAM Bank and the customer agree a fixed price for the underlying transaction such as fixed-rate transactions for securities (especially bonds), interest and currency swaps and other over-the-counter financial forward transactions.



Additionally, the execution policy does not apply to the issuance or recalling of shares in mutual funds by the custodian bank. Such measures are carried out by the custodian bank of the mutual fund or an intermediary (e.g. a bank or fund trading platform).

## 2.) Weighting of execution aspects

The best possible result for a private customer is determined in terms of the total consideration that the customer has to achieve when selling or pay when buying. This encompasses the price of the financial instrument and the costs associated with the execution of the order.

Crucially, the price (rate) is dependent on the price quality of the execution venue.

In particular, the price quality can be determined on the basis of long-term liquidity.

The costs cover all expenses incurred by the customer in direct connection with the execution of the order. As the various execution venues charge similar fees, liquidity is regarded as the main factor in the determination of the execution venue.

Additional execution factors are taken into account if the scope of the order is significant or if the order has to be executed over the counter. In these cases, the significance of the likelihood of execution and settlement increases, as does the speed of execution under certain circumstances.

EURAM Bank weighs the aspects of execution equally for private customers and business customers.

## 3.) Implementation

If required EURAM Bank has its own direct connection to execution venues (multilateral trading facilities). However, usually, in line with its execution policy, EURAM Bank passes orders on to an intermediary (e.g. a broker), especially Wiener Privatbank SE and Baader Bank AG, for the purposes of execution. For the potential execution venues, see item 4.

Orders can – in consultation with the customer - also be executed away from regulated trading venues if the execution and settlement would otherwise be unlikely (e.g. over-the-counter execution of listed certificates with no liquidity on the stock exchange).

Under certain circumstances, EURAM Bank compiles multiple customer orders to acquire or sell subscription rights, provided that this is not disadvantageous for the customer overall. Customer orders are not compiled with orders that are to be executed on the account of EURAM Bank. In doing so, EURAM Bank ensures that the affected customers are not disadvantaged if at all possible. However, please note that compilation might even be disadvantageous for individual orders.

As a priority, purchase orders are executed at the largest execution venue in the country of issue as, with consideration for the liquidity of the markets, the orders can be executed in that country in a manner befitting the weighting of the aspects of execution.

## 4.) Execution venues

### a) Regular execution venues:

Shares, funds traded exclusively at stock exchanges, derivatives, other equities, certificates and warrants

On the basis of the weighting of the criteria described above, orders are preferentially executed at the main trading venue, another regulated market or a multilateral trading facility since an execution consistent with the weighted execution criteria is regularly possible here, taking into account existing stock exchange memberships and the liquidity of the markets. The main trading venue is the stock exchange defined by the issuer and/or which generates a significant volume of trading. Orders are regularly executed at the leading stock exchange of the country in question (e.g. Vienna, Frankfurt, Stuttgart, London or New York).



## (i) Bonds

For bonds, the likelihood of execution is weighted more heavily alongside the total consideration. The order is executed through the multilateral trading facility and is executed either at the stock exchange (main trading venue) or over the counter, or even through a third party.

## ( ) Issue and redemption of shares in funds

Shares are issued and redeemed by the custodian bank of the mutual fund or through fund trading platforms.

## b) Special execution venues

Customer orders can be executed outside of regulated trading venues if their execution and settlement would otherwise be unlikely.

## 5.) Customer instructions

For an individual transaction or in general, the customer can give EURAM Bank express instructions concerning the execution venue at which an order is to be executed or how execution aspects are to be weighted. These instructions take precedence over the execution policy.

Please be aware that customer instructions can prevent EURAM Bank from generating the best possible result for the customer as part of its execution policy. This also applies to the issuance of specific order amendments. When issuing orders, the customer can select an execution venue that can accommodate the order amendments the customer desires.

## IV. Conflicts of interest

### 1.) General information on the guidelines for handling conflicts of interest

EURAM Bank has guidelines for handling conflicts of interest. These guidelines are intended to prevent a conflict of interest between

- a customer and EURAM Bank;
- a customer or an employee of EURAM Bank;
- a customer and a company controlled by EURAM Bank;
- customers of EURAM Bank;

and impairs the interests of the customer.

The main features of these guidelines are as follows:

- The overriding principle is the avoidance of conflicts of interest. To this end, EURAM Bank has a compliance officer who, in the event of an unavoidable conflict of interest, ensures that the investment transaction is settled in a manner consistent with the statutory regulations and submits regular reports to the managers. When consulting services are provided, only the interests of the customer are taken into consideration.
- Any trading on the account of EURAM Bank takes place separately from trading for customers.
- In the event of a conflict of interest caused by scarcity (i.e. there are more customer orders than can actually be executed), clearly formulated principles of allocation (e.g. the principle of priority or pro-rata division) that have been drawn up prior to allocation are applied in order to prevent the subjective prioritisation of individual customers. Depending on the specific role of EURAM Bank in each case, customers are made aware of other conflicts of interest.



- The prices of our own products are always set on the basis of the current market situation.
- Befitting its size and organisational structure, EURAM Bank has defined areas of confidentiality in order to prevent a flow of information between people whose activities might result in a conflict of interest. If, on a case-by-case basis, an information transfer that might result in a conflict of interest is unavoidable between the defined areas, this fact is reported to the compliance officer who then takes appropriate steps.
- EURAM Bank has implemented organisational measures to ensure that any and all improper influences over the nature and type of security services are avoided.
- The employees of EURAM Bank are provided with ongoing training on how to handle conflicts of interest.
  - Investments that might result in a conflict of interest under the Austrian Stock Exchange Act (BörseG) are disclosed on the website of EURAM Bank.

If, despite the measures listed above, a conflict of interest should prove unavoidable, EURAM Bank will notify the customer either generally or before the contract is awarded in order that the customer is able to make a decision in the knowledge of the conflict of interest.

## 2.) Information on specific details

On request, EURAM Bank will provide the customer with more specific details about its guidelines for handling conflicts of interest.

## V. Financial incentives

### 1.) General information on remuneration for product marketing

EURAM Bank receives remuneration for providing investment advice on a dependent basis, as well as for ongoing customer support.

Remuneration (bonuses) is only accepted under strict conditions. The remuneration is used to improve quality for customers. Generally speaking, EURAM Bank ensures that remuneration does not prevent EURAM Bank from fulfilling its duties towards its customers to the best of its abilities.

With regard to discretionary asset management (see item II. 1d), remuneration (bonuses) is passed on to the customer unless it takes the form of a non-monetary, negligible benefit.

Tailored customer advice with consideration for the principle of risk diversification is of great importance to EURAM Bank. The options offered by the advisor are based on the requirements of the customer and not on the various types of remuneration for products. The size of the ongoing commission depends on the type of product and on the issuer or trade intermediary.

EURAM Bank regularly receives such commission from its partners:

- Load for serving as a broker for mutual funds (up to the full amount of the calculated load)
- Administrative fee (fund): up to the full amount of the annual administrative fee from the value of the shares in the securities account of the customer

With regard to the issuance of securities, under certain circumstances, EURAM Bank receives sales commission from the issuer or its sales partner.

### 2.) General information on remuneration in connection with customer brokering

If EURAM Bank brokers a business relationship between a customer and another financial institution or third party, EURAM Bank is paid remuneration by the financial institution or other third party; in turn, EURAM Bank pays remuneration in the form of a finder's fee to any financial institution or other third party that brokers a business relationship between EURAM Bank and a customer. In both cases, the amount of the remuneration is either a percentage of the fees received (remuneration) or a percentage of the margin of the brokered business



### 3.) Information on specific details

On request, EURAM Bank provides customers with more specific details regarding the remuneration described in items 1.) and 2.).

The retained benefits are disclosed to the customer before the order is placed.

## VI. Custodianship of securities for customers

### 1.) Third-party custodians

Securities which EURAM Bank is responsible for holding for its customers are passed on to institutions which specialise in the custodianship of securities (third-party custodians), including in order to ensure the highest possible level of protection for the securities. EURAM Bank is liable towards the affected customer for any and all damage suffered as a result of illegal and culpable action or inaction on the part of the third-party custodians. If securities are being held for a customer who is an entrepreneur, the liability of EURAM Bank is limited to the careful selection of the third-party custodian. If, despite careful selection, a third-party custodian becomes insolvent, EURAM Bank can demand the return of the securities that it transferred to the third-party custodian for holding.

### 2.) Collective safe custody

Securities which EURAM Bank is responsible for holding for its customers are stored along with the same securities of other customers (collective safe custody). As every customer can demand the return of his/her share of the collectively stored securities (including if EURAM Bank or the third-party custodian should become insolvent), the collective custodianship does not give rise to any particular risks for the customer.

### 3.) Custodianship abroad

It might be necessary to have securities held by third-party custodians abroad, especially outside

of the European Economic Area. Consequently, they are subject to the legal regulations of the state in which they are being held. These legal regulations can differ significantly from the regulations in Austria and will not necessarily provide the same level of protection.

### 4.) Protection of customers' securities

As an Austrian bank, EURAM Bank is unrestrictedly subject to the provisions of the Austrian Deposit Guarantee Schemes and Investor Compensation Act (ESAEG).

EURAM Bank is part of the deposit protection scheme of Banken & Bankiers Gesellschaft m.b.H.

The necessary information for

- investors, especially information about the provisions concerning the procedure for refunding deposits and the terms and conditions of deposit protection and

- investor compensation

can be found on the deposit protection homepage of Banken & Bankiers Gesellschaft m.b.H. ([www.einlagensicherung.at](http://www.einlagensicherung.at)).

Otherwise, please see the statutory provisions; on request, we would be happy to provide you with a copy.

#### a) Deposit protection

The deposits of natural persons and legal entities (i.e. deposits and account or savings book credit such as salary, savings and pension accounts, securities accounts, other current accounts, fixed-term deposits or capital savings books) are protected up to the maximum amount of EUR 100,000 per depositor, regardless of whether the deposit is private or business-related. Deposits that can be reimbursed are not to be factored into the calculation of protected deposits if the depositor has liabilities towards EURAM Bank that can

be offset in accordance with statutory or contractual provisions and which became payable before or, at the latest, on the date on which the protection was required. The maximum amount always relates to a financial institution.





## b) Investor compensation

Under Austrian law, securities must be returned to the investors by the custodian bank. The assets do not include securities that are merely being held by the bank. They are returned to the investor or transferred to the portfolio of another bank.

Claims for money under the title of investor compensation are protected up to a maximum amount of EUR 20,000 both in case of natural persons and for legal entities. If the customer is a legal entity (e.g. a company or organisation), it must pay an excess of 10%.

## c) Claims covered by the investor compensation scheme

In principle, all claims against the bank arising from

- the safekeeping and administration of securities (custody business);
- the bank trading with money market instruments, financial futures, future rate agreements, forward rate agreements, interest rate and currency swaps, equity swaps, securities and derivatives thereof;
- the bank's participation in underwriting third-party issues (third-party securities underwriting);
- the acceptance and investment of severance pay contributions and pension fund contributions of self-employed persons (corporate pension fund business) are covered.

## d) Exclusions from the investor compensation scheme

The exclusions from the investor compensation scheme provided for in Section 47 ESAEG are presented below in a simplified manner.

In particular, claims are not protected if they result from securities transactions

- of credit and financial institutions, insurance companies or securities companies;
- of pension funds or joint security investment organisations;

- of government bodies, especially states, regional and local authorities and central administrations;

- of components of own funds, debt securities and liabilities from own acceptances and promissory notes of a credit institution;

- of persons related to the bank such as managing directors, executive board members, supervisory board members, personally liable partners (in the case of partnerships under commercial law), auditors of the bank and persons who hold at least 5% of the bank's capital, even if those persons hold offices in affiliated companies of the bank (except where minor stakes are concerned);

- of relatives of persons related to the bank and third parties if the close relative or third party works for the account of the person related to the bank;

- of other companies which are affiliates (in the sense of Section 244 of the Austrian Commercial Code (UGB)) of the bank;

in connection with transactions on the basis of which persons have been convicted in a non-appealable manner for money laundering in criminal procedures;

- for which the beneficiary has, on an individual basis, obtained interest rates or other financial benefits which contributed to the deterioration of the financial situation of the bank or investment firm;

- of companies which meet the requirements of large companies as defined in Section 221 (3) UGB.

## e) Limitation with regard to deposit protection and investor compensation

There is no entitlement to double compensation due to the fact that compensation pursuant to the provisions of deposit protection and investor compensation is paid for one and the same claim. Claims with respect to credit balances in accounts covered by deposit protection have to be compensated under the deposit protection scheme.



## 5.) Liens and rights of retention

Assets held by EURAM Bank are subject to a lien and right of retention on the part of EURAM Bank in order to secure all claims of EURAM Bank against the customer. With regard to the entitlements of the third-party custodians in connection with the safekeeping of the securities (especially safekeeping fees), third-party custodians can exercise liens with respect to the securities they are safekeeping.

## VII. Terms and conditions and costs

### 1.) Safe custody agreement

Along with this general information about investments, before opening a securities portfolio, the customer will receive a sample account and securities account opening application (opening documents) which the customer will have to submit to EURAM Bank if he/she is interested in trading in securities with EURAM Bank.

### 2.) Prices and costs

The standard fees charged by EURAM Bank for services relating to securities are set out in the schedule of fees (a component of the account and securities account opening documents) which is issued to new customers when they sign the safe custody agreement (the account and securities account opening application). Besides the fees of EURAM Bank set out in the schedule of fees, securities transactions require expenses which EURAM Bank has to pay to third parties whilst executing customer orders (especially third-party fees, the purchase price or rate of purchased securities and broker fees). The customer must also cover these expenses.

Costs are disclosed to the customer in good time prior to the conclusion of the transaction as well as once per financial year after the conclusion of the

transaction. The costs are disclosed to the customer in their entirety. In this context, the proportion of remuneration in the total costs is indicated separately. All costs are expressed both as percentages and figures. If the percentage-based costs are, for example, 1% with an investment of EUR 1,000, costs of EUR 10 must be indicated.

### 3.) Foreign exchange transactions

If, in connection with a customer order, it becomes necessary for EURAM Bank to make payments in any foreign currency or to convert payments received in any foreign currency into euros, EURAM Bank will carry out the conversion on the basis of a (reasonable) exchange rate based on market rates that is generally used by EURAM Bank for its customers at the time of settlement.

Any further fees or expenses relating to currency conversion can be found in the schedule of fees.

The share of the foreign currency costs in the total costs is disclosed to the customer in good time prior to the conclusion of the transaction as well as once per financial year after the conclusion of the transaction.

### 4.) Additional taxes and expenses

In addition to the aforementioned fees and cash expenses, the customer might be subject to further costs and taxes (e.g. Austrian or other capital gains taxes) that are not necessarily paid through EURAM Bank or invoiced by EURAM Bank. Customers are themselves responsible for meeting their tax obligations, especially those arising in their home country.

### 5.) Customer payments

Unless agreed otherwise, amounts payable to EURAM Bank by the customer as part of securities transactions will be debited from the account of the customer with EURAM Bank.



## VIII. Complaints

EURAM Bank always strives to provide its customers with the best possible support with their business, requests and requirements in all matters relating to banking. Should the customer nevertheless have reason to complain, EURAM Bank shall investigate that complaint without delay. To this end, customers should contact their customer advisor or, if no satisfactory conclusion can be obtained this way, either the management of EURAM Bank or the complaints office of EURAM Bank (<mailto:beschwerde@eurambank.com>).

If the complaint relates to a specific securities transaction, please provide all known details about the transaction so as to facilitate the rapid investigation and settlement of your complaint.

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