

INDUCEMENTS

As referred to in the Act on Investment Services, inducements mean brokerage fees, commissions and other monetary and non-monetary benefits that a third party or a person acting on behalf of a third party pays or offers in conjunction with an investment service or an associated ancillary service. Paying or receiving inducements is forbidden, except where the payment or benefit is designed to enhance the quality of the service provided to the client and does not impair compliance with the obligation of the investment firm to act honestly, fairly and professionally in accordance with the best interest of its client.

In conjunction with offering an investment or ancillary service, Evli Plc (hereinafter Evli) and companies that belong to the Evli Group may make a payment or pay a fee to a third party or receive payments or fees from a third party provided that they are not related to asset management or independent investment advice. The third party may be an external service provider, another market party or another Evli Group company. If Evli accepts inducements related to asset management services, such monetary benefits are returned to the asset management client in full in arrears. Any inducements and their potential returns to clients are reported in connection with the periodic reporting provided to the client.

Evli has partners with which it has agreed on inducements. Payments and fees are used to cover costs from operations, and their purpose is to improve the quality of the service offered to clients who are the target of the service and to enable the provision or maintenance of a particular service or product. Evli may incur expenses and costs from mapping a financial instrument suitable for the client, providing potential investment advice related to the purchase or subscription of the financial instrument, transferring and processing the purchase or subscription and any related subsequent sale or redemption and the payment transactions required, obtaining information on the expenses and related charges as well as on responsibility of the financial instrument and taking into account the information as part of the reporting provided to the client. The payment or receipt of payments or fees may not cause a conflict of interest between Evli and a client or lead to actions that are biased or contrary to the interests of the client.

With the help of its comprehensive network of partners, Evli offers its clients a large selection of different types of investment alternatives and maintains products and services of a high standard. In order to avoid conflicts of interest, Evli seeks to negotiate terms and conditions on inducements with third parties so that they are as consistent as possible and will not influence investment decisions or investment advice.

Incentives associated with funds

Evli Plc may receive fee reimbursements on the management fees charged by Evli's partners from the subscriptions made by Evli's individual clients at any given time. The amount and determinants of the fees vary according to fund management company based on invested assets, fund type and type of fund unit, for example. The incentives paid by Evli's partners may be 0% at minimum, roughly half of the management fee charged by a fund at maximum, and 100% at maximum of the subscription and redemption fees of a fund. The fees reimburse Evli for the management of investment-related administrative tasks and obligations described above. Fees based on management fees are continuous incentives.

Payments associated with solicitation of potential customers

Evli may pay a one-time fee to a third party as a remuneration for assisting Evli to find new potential clients. The fee is based on a contract between Evli and the third party. Remuneration is based on certain percentage of the service fees paid by the client to Evli. Payment of such fee does not affect the pricing of the client's service, nor does it incur any costs for the client.



Minor non-monetary benefits

Evli may receive and offer its partners other non-monetary benefits if they can be considered to be of a minor nature. Minor non-monetary benefits include presentation material and support related to products and services and training and seminars and associated reasonable refreshments offered in conjunction with them. The purpose of such other benefits is to enhance skills and improve product knowledge, for example.

Information on the inducement and its assessment

Before offering investment or ancillary services, Evli informs clients of the existence of a fee or benefit that is considered an inducement, of its nature and amount or calculation principle. If the exact amount of the benefit cannot be provided in advance, the actual amount of received and paid benefits will be reported annually in arrears. Information on these can be provided in summary form.

Inducements paid or received by Evli, other than minor non-monetary benefits, are primarily directed towards the client or client group to whom additional services are supplied i.e. clients who use asset management services and clients who through Evli subscribe to funds managed by its partners. Evli regularly assesses its arrangements made with parties associated with inducements and strives to negotiate changes potentially needed if Evli considers that the client's interest so requires. The assessment takes into account the additional service received by the client or client group and its importance to the client in relation to the inducements received or paid by Evli.