## Luminor

### GENERAL INFORMATION ON PAYMENTS RELATED TO PROVISION OF INVESTMENT AND ANCILLARY SERVICES

When providing investment and (or) ancillary services, Luminor Bank AB (previous name - AB DNB Bankas, hereinafter also referred to as "the Bank"), seeks to act honestly, fairly and professionally, in accordance with the best interests of its clients, avoids conflicts of interest

and implements all necessary measures to identify conflicts of interest arising in the course of provision of investment and (or) ancillary services<sup>1</sup> (hereinafter referred to as "the Conflict of Interest").

Prior to the provision of investment and (or) ancillary services, the Bank shall clearly disclose the nature and source of the Conflict of Interest to the client.

Luminor Bank AB hereby informs that the receipt or payment/provision of monetary or non-monetary benefits by the Bank from or to any third parties in relation to the provision of investment and (or) ancillary services to the client may give a rise to a Conflict of Interest.

Proper monetary payments and non-monetary benefits (hereinafter referred to as "the Payments") are classified into three categories:

1) Payments directly received from or paid to the client or the person acting on behalf of the client in relation to the provision of an investment and (or) ancillary service (e.g. a commission fee for the investment service);

2) Payments directly received from the client or the person acting on behalf of the client for the provision of the services which enable or are necessary for the provision of an investment and (or) ancillary service. Such Payments include custody costs, settlement and foreign exchange costs, stock exchange fees, regulatory levies and any similar payments, which, by their nature, cannot give a rise to a Conflict of Interest and cannot impair compliance with the Bank's duty act honestly, fairly and professionally in accordance with the best interests of its clients;

3) Payments made to and (or) received from third parties (hereinafter referred to as "the Inducements"). Though Inducements may give a rise to a Conflict of Interest, they are classified as proper if they are designed to enhance the quality of an investment and (or) ancillary service provided to the client and cannot not impair compliance with the Bank's duty act honestly, fairly and professionally in accordance with the best interests of its clients, and a prior disclosure of such payments has been made to the client.

## PRIOR DISCLOSURE OF INDUCEMENTS

Under the Republic of Lithuania Law on Markets in Financial Instruments and in accordance with the provisions of Clauses 8-9 of the Rules on Provision of Investment Services and Receipt of Client Orders approved by the Bank of Lithuania (hereinafter referred to as "the Rules"), the information on Inducements shall be disclosed to the client prior to the provision of the relevant investment and (or) ancillary service.

In view of the fact that the Rules allow to provide a summary disclosure of the essential terms of the arrangements relating to Inducements, Luminor Bank AB hereby informs that below specified Inducements are received from and paid to investment fund managers and other financial intermediaries.

#### INDUCEMENTS RECEIVED

Investment fund managers periodically pay fees (inducements) for selling of units of investment funds managed and (or) distributed thereby. The aforementioned periodically paid fees (inducements) depend on investment funds' management fee. Typically the amount of inducement is calculated as a particular percentage of the annual management fee of a specific investment fund.

The table below details the information on the Inducements received by the Bank in relation to the distribution of investment fund units:

Investment fund (ISIN)	Annual investment fund management fee	Inducement (Parto of annual investment fund management fee received by Bank)
DNB fund – Asian Small Cap (LU0067059799)	1,75%	50%
DNB fund – Global Emerging Markets (LU0090738252)	1,75%	50%

<sup>&</sup>lt;sup>1</sup> For further information on the conflicts of interest in relation to the provision of investment and ancillary services by the Bank please refer to the Bank's Policy for Avoiding Conflicts of Interest in Providing Investment Services, available on the Bank's website at the address https://www.dnb.lt/en/private/savings-and-investments/information-for-investors.

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Investment fund (ISIN)	Annual investment fund management fee	Inducement (Parto of annual investment fund management fee received by Bank)
DNB fund – Global SRI (LU0029375739)	1,25%	50%
DNB fund – India (LU0302237721)	1,50%	50%
DNB fund – Private Equity - B (LU0302296065)	1,75%	50%
DNB fund – Scandinavia (LU0083425479)	1,25%	50%
DNB fund – Technology (LU0302296495 ir LU1047850349)	1,50%	50%

Investment fund managers and (or) other financial intermediaries also provide the Bank with the research going beyond the mandatory information that should be provided to clients and allow to participate in training courses, workshops or conferences free of charge or at a reduced charge.

#### **INDUCEMENTS PAID**

Luminor Bank AB pays Inducements (commission fees) for the representation of the Bank in the course of providing the service of trading via DNB Trade in Latvia and Estonia to the Luminor Group banks operating in the relevant jurisdiction: Luminor Bank AS (Latvia) in Latvia and Luminor Bank AS (Estonia) in Estonia. The aforementioned banks have cooperation agreements with the Bank, whereunder they are responsible for the introduction of the service of trading via DNB Trade to their clients and the performance of other functions stipulated in the relevant agreement. The Inducement (commission fee) paid by the Bank to Luminor Bank AS (Latvia) for the representation of the Bank in provision of the DNB Trade service in Latvia is 80% of the commission fees paid by the Latvian jurisdiction clients to the Bank, and that paid by the Bank to Luminor Bank AS (Estonia)for the representation of the DNB Trade service in Estonia is 50% of the commission fees paid by the Bank.

In the course of providing the service of trading in derivative financial instruments in Estonia, the Bank pays Inducements (commission fees) to Luminor Bank AS (Estonia) for the representation of the Bank in Estonia, i.e. the introduction of the service to its clients and the technical advice provided to them within the framework of the relevant cooperation agreement. The Inducement (commission fee) paid by the Bank to Luminor Bank AS (Estonia) for the representation of the representation of the Bank in providing the service of trading in derivative financial instruments in Estonia is 70% of the income received from the Estonian jurisdiction clients by the Bank.

#### **GENERAL PROVISIONS**

All the Inducements hereinabove, received or paid by the Bank, are designed to enhance the quality of the relevant investment service and do not impair compliance with the Bank's duty to act honestly, fairly and professionally, in accordance with the best interests of its clients.

At the written request of the client, the Bank undertakes, within 15 (fifteen) business days from the date of receipt of the written request, to disclose further information on the amount of Inducements or, where the amount of Inducements cannot be ascertained, the method of calculating that amount. The client may submit a written request for further information at any client service branch of Luminor Bank AB in person or via the internet banking system of the Bank.