

General Information on Transactions in Financial Instruments

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(“**RBI**”)

This document serves the purpose of providing general information on circumstances that may be relevant with respect to investment services provided to customers by RBI. Additional information shall be provided to customers if necessary or upon request the customer’s request.

1. Information on RBI

1.1 License

RBI is fully licensed to perform services in the banking business, including investment services for its clients. The competent regulatory authority is the Austrian Financial Market Authority (FMA), Otto-Wagner-Platz 5, A-1090 Vienna, as well as the Austrian National Bank, Otto-Wagner-Platz 3, A-1090 Vienna. In addition RBI is subject to the supervision of the European Central Bank (ECB) within the scope of the Single Supervisory Mechanism – SSM which consists of ECZ and the national competent authorities pursuant to the SSM Regulation EU 1024/2013.

1.2 Communication with RBI

RBI uses the German and English languages when communicating with its customers. Besides personal meetings with RBI staff during the usual business hours, the communication channels set out above are available to customers, except where particular means of communication have been agreed with, or communicated to the customers. The means of communication available for the purpose of acceptance and transmission of orders are set out in RBI’s Order Execution Policy for Professional Clients and Retail Clients – see item 3 below. Legally relevant communication between RBI and its customers will generally be in writing.

2. Information on Investment Services

2.1 Investment advice in respect of OTC derivatives:

On the basis on an analysis of the customers’ objectives, knowledge and experience, financial situation, and risk tolerances RBI gives a recommendation of suitable OTC Derivatives for the purpose of risk reduction

(hedging). RBI provides so-called non-independent investment advice in respect of a limited range of OTC derivatives and structured deposits that have been developed by RBI itself. The actual circumstances of the client's arrangement originating the risk which the client wishes to hedge by entering into an OTC derivative transaction can only be taken into account in the advisory process if either RBI is itself the counterparty of the client, or the client has provided RBI with sufficient information on that arrangement. Recommendations regarding derivative transactions will not take into account any investments by the client in other types of financial instruments.

RBI's sales personnel have a high degree of expertise regarding the recommended derivative products and can provide the client with detailed product information.

RBI also offers advisory free investment services with respect to OTC derivatives and structured deposits which a retail client wishes to agree with RBI upon the client's initiative. In these cases RBI will not check whether the proposed transaction is in line with the client's objectives, financial situation, or risk tolerance (no suitability test). In respect of Retail Clients RBI will, however, verify whether the proposed transaction is appropriate in view of the knowledge and experience of the person entering into the transaction on behalf of the client (appropriateness test).

2.2 Non-advisory business regarding exchanged traded derivatives, securities, and other investment products

RBI provides its customers with an opportunity to purchase and sell investment products. Depending on the product, RBI acts as a buyer or seller itself, or conducts the transaction desired by the customers for their account with a third party, and in that connection it is frequently necessary to use other intermediary partners to whom the customer order is transferred.

2.3 Safe custody and management of securities, including maintenance of a clearing account

RBI keeps securities in safe custody for its customers, for which professional third-party custodians are used on a regular basis.

2.4 Information on the risks associated with financial instruments

A general description of the types of financial instruments in respect of which investment services will be performed as well as the risks generally associated with such financial instruments are set out in a separate document referred to as „Risk Disclosure Financial Instruments“ that is available on RBI's website www.rbinternational.com/riskdisclosurefinancialinstruments.

Specific risk information will be made available to the customers if necessary or upon the customer's request.

2.5 Additional information for clients

RBI will inform its clients on a continuous basis regarding investment services performed by RBI, as required by applicable law. Information on costs and charges arising in connection with the offered investment service or the acquisition of the relevant financial instrument will be made available on a durable medium, ex-ante in standardized or personalized form, and ex-post at least annually at the end of each year. Customers will receive mandatory reports on the investment services and transactions in financial instruments at least quarterly at the end of each calendar quarter, and statements of the financial instruments on the customer's deposit accounts will be made available on a durable medium as agreed in relation to the relevant deposit account. Confirmations of the execution of orders or the conclusions of transactions will be provided to the clients in the agreed manner on the following business day, or one day after RBI receives a relevant confirmation from a

third party where the order was executed.

3. Execution Policy

RBI has defined principles according to which client orders will be executed, in order to achieve the best possible results for the client. These principles are set out in RBI's Order Execution Policy for Professional Clients and Retail Clients. It contains a summary specifically addressed to retail clients. The full version of RBI's Order Execution Policy is available on RBI's website www.rbinternational.com/executionpolicy.

4. Conflicts of Interest

4.1 General information on the guidelines for handling conflicts of interest

RBI has issued guidelines for handling conflicts of interest. These guidelines are to prevent that a conflict of interest arising between a customer on the one hand and RBI or one of its employees or a company controlled by RBI on the other hand, or also between RBI customers is detrimental to customer interests. The main elements of these guidelines are as follows:

- The top principle is the avoidance of conflicts of interest. To this end, a Compliance Officer has been appointed by RBI, who ensures in case of unavoidable conflicts of interest that the investment transaction is handled according to the legal provisions, and reports to the Managing Board at regular intervals.
- When counseling services are performed, the exclusive focus is on customer interest.
- RBI's own account trading is separate from customer trading.
 - If there are conflicts of interest due to a lack of liquidity in the capital market (i.e., there are more customer orders than can actually be completed), clearly phrased principles of allocation, defined before allocation, (e.g., priority principle or pro rata distribution) are used to prevent preferential treatment of individual customers. Other conflicts of interest are communicated to the customer in the individual case, depending on the concrete role of RBI.
- With own products, prices are always determined on the basis of current market conditions.
- RBI has defined confidential areas in order to prevent the exchange of information between persons whose activity might produce a conflict of interest. If an exchange of information between the defined areas is unavoidable in individual cases, so that a conflict of interest might arise, this fact is reported to the Compliance Officer who then takes the respective measures.
- Organizational measures at RBI ensure that any undue influence on the manner in which securities-related services are performed is prevented.
- RBI employees are continuously trained.
- If a conflict of interest cannot be avoided despite the measures stated above, RBI will inform the customer before the placing of an order either generally or with respect to a current case, so that the customer can make a decision, knowing about the conflict of interest.

5.1 Detailed information

Upon request, customers personally receive from RBI further details on the guidelines for handling conflicts of interest.

5. Fees, Commissions, and Non-monetary Benefits

RBI receives fees and/or non-monetary benefits from certain third parties in connection with transactions in financial instruments and/or the provision of investment services.

5.1 Fees and commissions

RBI regularly receives such fees and commissions in the form of trailer fees paid by investment fund companies related to fund units held by RBI's customers on their deposit accounts with RBI. RBI also receive fees from clients who issue financial instruments and retain RBI for services related to the issue, which may include the distribution of such instruments to investors. RBI forwards any such fees or commissions to its professional and retail clients to the extent required by law. Trailer fees are forwarded to such client by at least quarterly payments or credits to the customer's account.

5.2 Non-monetary benefits

Certain non-monetary benefits received by RBI are considered minor if they are commensurate, reasonable, and small in size so that they are unlikely to impair RBI's duty to act in its clients' best interest. Such minor non-monetary benefits include (i) information on certain details, or a documentation regarding a financial instrument or an investment service, prepared generically or specifically in respect of the situation of a client, (ii) freely available written material prepared by third parties and commissioned and paid for by a (potential) corporate issuer in order to promote a new issuance by the company, (iii) education and training events and invitations to conferences on product or capital market related topics, (iv) invitations for food and drink at reasonable price levels at events set out in (iii) above or at business meetings. Any non-monetary benefits received by RBI that are not considered to be minor will be appraised using market standard criteria. Such benefits will be accepted by RBI for the sole purpose of enhancing the quality of the investment service provided to the customers. RBI will maintain records for that purpose, and will determine on an annual basis how such non-monetary benefits have increased the quality of the investment services to the relevant group of clients. The monetary value of any such benefits that are not covered by the costs of such quality enhancing measures will be forwarded to the relevant group of clients on an annual basis.

6. Client Instruments and Funds

6.1 Third-party custody

Financial instruments that are to be held in safe custody by RBI for its customers are transferred to institutions ("sub-custodians") specializing in the safe custody of securities (also in order to ensure the best possible protection of these securities. RBI uses only sub-custodians whose reputation and professionalism are beyond any doubt, and acts with the appropriate standard of professional care when selecting and regular monitoring the sub-custodians and the terms and conditions of the agreements concluded with them. RBI is liable to the relevant customer for any damage caused by the sub-custodian's unlawful, culpable actions or failures to act. However, if RBI customers order the safe custody of securities within the scope of their business enterprise, the liability of RBI is restricted to the careful selection of the sub-custodian. Custody within Austria and the countries of the European Economic Area is arranged in such manner that, should any sub-custodian become insolvent despite having been carefully selected by RBI, RBI shall have a claim for the recovery of the financial instruments held by the relevant sub-custodian.

6.2 Collective safe custody

Financial instruments held in safe custody by RBI for any customer are kept together with the same financial instruments of other customers ("collective safe custody"). Since (even in case of insolvency of RBI or the third-party custodian) As Each customer has a claim for the recovery of its share of the financial instruments kept in collective safe custody even in case of an insolvency of RBI or any sub-custodian, such collective safe custody does not cause any particular risks to the customer.

6.3 Safe custody in third countries

It may be necessary for financial instruments to be kept in safe custody by sub-custodians in countries outside of the European Economic Area. These securities are thus subject to the legal provisions of the state in which they are kept in safe custody. These legal provisions might differ considerably from those in force in Austria and do not necessarily provide the same level of protection. RBI uses sub-custodians in such jurisdictions in which the custody of financial instruments on behalf of other persons is subject to special requirements and supervision, and where the relevant sub-custodians are subject to such requirements and supervision. Financial instruments will be held in any country where such requirements or supervision do not exist only if necessary and to the extent permitted by law.

6.4 Deposit protection and investor compensation

RBI is a member of Österreichische Raiffeisen-Einlagensicherung eGen Am Stadtpark 9, +43 1 71707 1884, oere-office@rzb.at, www.raiffeisen-einlagensicherung.at, which is responsible for the statutory deposit guarantee for client funds held by RBI.

Detailed information on the applicable deposit guarantee and investor compensation scheme is available on RBI's website www.rbinternational.com/depositprotectioninvestorcompensation

6.5 Liens and rights of retention

Clients' assets held by RBI are subject to a lien and retention right of RBI to secure claims of RBI towards customer, and when held with a sub-custodian, may be subject to such liens and retention rights securing claims of the sub-custodian related to its custodial services.

7. Miscellaneous

7.1 Deposit Account Agreement

Custodial Services are subject to an agreement concluded between the customer and RBI with respect to the relevant deposit account.

7.2 FX transactions

If it becomes necessary in connection with a client order or transaction with RBI to make payments in any foreign currency or to convert payments received in any foreign currency into euros, RBI shall make such conversion on the basis of an exchange rate based on market rates that is used by RBI generally for its customers at the time of settlement. Any further fees or expenses are disclosed in the relevant fee schedule.

7.3 Additional taxes and expenses

In addition to any fees and expenses, the customer may be subject to further costs and taxes (e.g. Austrian or other capital yields taxes) that are not necessarily paid via RBI or invoiced by RBI. Customers are themselves responsible for meeting their tax obligations, in particular when arising in their home country.

7.4 Customer payments

Amounts payable to RBI by the customer in connection with transactions in financial instruments shall be charged to the customer's account with RBI, unless otherwise agreed.

8. Complaints

RBI takes all required measures to offer adequate solutions and to perform its services in the best possible manner. The client's satisfaction is RBI's foremost goal. In the event that a client is of the opinion that RBI did not fulfill the client's expectations or that it has a reason to complain, the client is asked to send a written statement specifying in detail of possible causes for a complaint to the address set out below, and RBI will promptly deal with the matter.

Raiffeisen Bank International AG
Complaint Handling (716B)
Am Stadtpark 9, 1030 Vienna
e-mail: complaints@rbinternational.com

Information on RBI's Complaints Management is available on RBI's website
www.rbinternational.com/complaintsmanagement

If in any particular case an amiable solution cannot be reached, the client is entitled to address the case to the Joint Conciliation Board of the Austrian Banking Industry.

Joint Conciliation Board of the Austrian Banking Industry
(Gemeinsame Schlichtungsstelle der Österreichischen Kreditwirtschaft)
Wiedner Hauptstraße 63, 1045 Vienna
e-mail: office@bankenschlichtung.at