



bradesco
europa

GENERAL INVESTOR INFORMATION

GENERAL INVESTOR INFORMATION

Information on Banco Bradesco Europa S.A.

Banco Bradesco Europa S.A. (the "Bank") is a credit institution incorporated in Luxembourg pursuant the law of 5 April 1993 ("Banking Law"), as amended, as a public limited company, having its registered office at 25, rue Edward Steichen, L-2540 Luxembourg and registration number B 18996. The Bank is authorised, regulated and supervised by the Commission de Surveillance du Secteur Financier ("CSSF").

The Bank's products and services are tailored according to client segmentation, which is comprised of private banking, corporate banking and institutional clients.

MiFID

Introduction

MiFID refers to Markets in Financial Instruments Directive (or "Directive"). It is an EU Directive that entered into force in November 2007. MiFID is the main regulation of the financial markets in the European Economic Area (hereinafter referred to "Europe") and it seeks to improve their competitiveness by creating a single market for investment services and activities and to ensure a high degree of harmonised protection for investors in financial instruments.

MiFID sets out:

- conduct of business and organisational requirements for market participants
- products governance
- information requirements to clients and potential clients
- client data
- suitability and appropriateness
- best execution and order handling
- trade transparency and client reporting requirements
- obligation to preserve market integrity

MiFID II is the revamped revised Markets in Financial Instruments Directive that applies since 3 January 2018 across Europe. MiFID II aims to make the European markets safer, sounder, more transparent and more efficient. In order to achieve its goals, it strengthens investor protection and transparency.

In addition, Markets in Financial Instruments Regulation ("MiFIR") and Package Retail and Insurance-Based Products Regulation ("PRIIPS") complement MiFID by adding record keeping and transaction reporting obligations that increases the amount of information available to the authorities to prevent market abuse and increasing the pre-contractual to clients in regards to financial instruments, respectively.

Client categorisation

The categorisation is required by the regulation and necessary as investors do not have the same level of knowledge and experience in the financial markets and of financial instruments and related risks. It aims to ensure that each client has adequate level of protection as to their respective category.

MiFID requires the Bank to classify its investor clients in one of the following categories:

- **Retail Clients**

Retail clients are neither eligible counterparties nor professional clients and benefit from the highest level of protection

- **Professional Clients**

Professional clients are large companies which meet criteria in terms of balance sheet size, turnover and own funds. Professional clients have the necessary expertise to make their own investment decisions and to assess and bear the financial consequences of any risks

- **Eligible Counterparties**

Eligible counterparties are professional clients (for example investment companies, credit institutions, pension funds, central banks, etc.) which operate in the financial sector and are therefore deemed to have the necessary investment expertise

As a measure to ensure all private banking clients are well protected, the Bank has decided to classify all clients as Retail Clients.

Nevertheless, clients have the possibility to change category, provided that the minimum criteria set out by MiFID is met. However, the Bank will decide at its own discretion whether to refuse or accept the request and reserve the right to change clients classifications at its own initiative.

Investor profile – understanding you better

On top of establishing different categories of clients, the Bank is required to have individual investor profiles, whereby certain relevant information are requested from clients. It is a paramount in order to know each client better to be able to serve adequately.

In this respect, the Bank has designed a specific questionnaire to understand each client circumstances to more precisely understand knowledge and experience of financial instruments, investment objectives, investment horizon, risk appetite, financial situation and ability to bear losses.

The investor profile assigned to the client as a result of the answers provided to this questionnaire is reported as part of the client position report. The reported investor profile is updated after any change in the answers provided in the questionnaire that result in a new profile category.

Banco Bradesco Europa SA
25, rue Edward Steichen,
L-2540 LUXEMBOURG
GRAND-DUCHÉ DE Luxembourg
TEL.: (+352) 25 41 31
TEL. Brazil: 0800 721 8850 (Toll Free)
SWIFT: BBDE LU LL
E-mail: info@bradesco.lu

Clients to have access to investment products and services need to have their respective investor profile established. Otherwise, the Bank will no longer be able to provide access to investment products and services because it will be unable to verify whether the products and services are appropriate or suitable to the relevant client.

As two types of accounts are available, individual and legal entity, the following rule applies: in case of individual account, the joint account holders can choose whose investor(s) profile should be the reference for the joint account, and in case of legal entities, the legal representatives authorised to carry on investment transactions should have their questionnaire.

The new regulations require the Bank to ensure that clients invest in products that are suitable for their investment objectives (including their level of risk tolerance), financial situation, investment objectives and their financial experience and knowledge.

Investment services

Investment services are defined as any of the services and activities listed in Section A of Annex I of the MiFID in relation to financial instruments. The Bank is mostly engaged in: (a) reception, transmission and execution of orders, (b) non-independent investment advice and (c) underwriting financial instruments (structured products).

Any investment service advice must be rendered in the framework of a contract.

The basic contractual framework between the Bank and the clients is the General Business Conditions, which governs the reception, transmission and execution of orders in the context of investment services.

The Bank is only allowed to receive inducements in connection with the provision of an investment service or ancillary service where the relevant payment:

- is designed to enhance the quality of the relevant service to a client of the investment firm
- does not impair compliance with the investment firm's duty to act honestly, fairly and professionally in accordance with the best interests of its clients and in order to avoid situations of potential Conflict of Interests.

Based on the type of investment services, the following quality enhancements are available:

Communication with the Bank

Possibility to use the parent company and its branches premises, free of charge, to communicate with the Bank.

Web Portfolio View

Possibility to access the portfolio via internet.

Regular Client Meetings

Commitment to meet clients, present the status of the services, financial situation and perspective.

Scenario and Market Information

Insights on market trends and scenarios.

10 % loss report

Inform clients in cases where any financial instruments reach the loss threshold of 10%.

Open architecture

Access to a wider range of instruments.

Ongoing Due Diligence Process

Monitor qualitatively and quantitatively all the approved fund managers, funds and ETFs.

List of securities

Information tool for investment decision.

For additional information, please consult your private banker.

Clients seeking investment advice must subscribe to the investment advisory service by signing a specific agreement. The investment advisory agreement together with the investor profile will determine the type of investment strategy and products clients may have access to.

Appropriateness and suitability test

In the context of reception and execution of orders, the Bank is required to perform appropriateness test in order to verify whether the relevant client has the necessary knowledge and experience to carry out the intended transaction if the client is within the target market set out by the product manufacturer of the relevant product, and inform the result to the client before executing the order.

When providing clients with investment advice (opinion and recommendations in relation to financial instruments), the Bank must take into consideration the relevant client investor profile and perform suitability test before each recommendation is given to the client. The Bank is not allowed to provide clients with any advice that are not suitable to them.

Best execution

The Bank has the obligation to ensure that client orders are executed on best possible conditions for its clients, taking into consideration price, cost, speed, likelihood of execution and settlement, size, nature of the client, type of order and any other consideration relevant to the execution of the order.

In this respect, the Bank has set out the Order Handling and Best Execution Policy, which is available at www.bradescoeuropa.eu or upon request.

Banco Bradesco Europa SA

25, rue Edward Steichen,
L-2540 LUXEMBOURG
GRAND-DUCHÉ DE Luxembourg
TEL.: (+352) 25 41 31
TEL. Brazil: 0800 721 8850 (Toll Free)
SWIFT: BBDE LU LL
E-mail: info@bradesco.lu

Comprehensive information

MiFID requires the Bank to provide you with detailed information at all stages of the execution of your transactions and, where applicable, about the proposed investment strategy.

The objective is to enable you to make well informed investment decisions by providing you with complete, fair, clear and not misleading information.

To this end, the Bank has reviewed the information provided to clients – including agreements, general information on the services provided, financial instruments and costs and charges.

Clients benefit, among others, from:

- comprehensive information on financial instruments before each trade, including their respective key investor information document (KIID) and target market
- revised information about financial instruments and related risks
- reports before and after each trade: pre-trade suitability report – to check whether an advice is suitable and post trade suitability report – to check if the portfolio still corresponds to client's investor profile following the execution of an order
- execution confirmation
- regular portfolio updates
- annual cost and charges report: presenting the amount of all costs and charges associated with the services provided by the Bank
- new and more transparent fee schedule (please refer to Fee Schedule document).

Information about financial instruments and related risks and the revised fee schedule are available at www.bradescoeuropa.eu or upon request.

Range of financial instruments that may be recommended

Only for clients who sign the investment advisory agreement, the Bank provides investment advice on financial instruments that form part of the range of financial instruments it has access to, has selected and analysed for that purpose, including financial instruments issued by Bradesco Group where the Bank may have a conflicting interest.

Investment Advice can take the form of reactive advice, at client's initiative, or proactive advice, at the Bank's initiative.

Unless agreed otherwise in writing, the Bank provides investment advice on a non-independent basis, which means that the range of financial instruments that are assessed by the Bank when providing investment advice may have or be limited to financial instruments issued or provided by the Bank or Bradesco Group (or the Bank

and Bradesco Group) may have a particular interest. However, it will always be the client's own responsibility to decide whether or not to follow investment advice given by the Bank.

Conflicts of Interest

The Bank and its clients are commercial partners having their own particular interests. In this context, conflicts of interest between the different parties may arise.

The Bank, committed and engaged to promoting and maintaining highest professional standards and practices when providing banking, investment and ancillary services to clients, has implemented the Conflicts of Interest Policy focusing on conflicts of interest in the provision of services that describes the circumstances, which constitute or may give rise to a conflict of interest, the procedures to be followed and measures to be adopted in order to prevent (if possible) or manage such conflicts.

Clients are kindly asked to read the Policy, which forms part of the General Business Conditions, which is also available at www.bradescoeuropa.eu or upon request.

MiFIR

MiFIR, introduced new record keeping rules and transaction reporting obligations aiming to increase trade transparency and combat market abuse practices. Under MiFIR, clients are required to provide to the Bank with additional information to carry out transactions and to allow the proper transaction reports to be filed to the authorities.

In order to carry out transactions of clients who are natural persons, the Bank is required to collect and record names, passport numbers (or their official identification number) and date of birth of the persons involved in the transaction and those representing the client. For clients which are legal entities, in addition to the personal information of the persons involved in the transaction representing the client, the Bank should collect and record name and legal entity identifier (LEI) of the legal entity. All of these information may be reported to the markets authorities within the framework of MiFIR.

Deposits Guarantee and Investor Protection Schemes

Banco Bradesco Europa S.A. is a member of the non-profit association "Fonds de Garantie des Dépôts, Luxembourg" ("FGDL"), whose sole object is the establishment of a mutual guarantee scheme covering deposits made by customers of member credit institutions ("the Guarantee").

The main purpose of the FGDL is, in case of failure of a member institution, to ensure compensation of depositors within 7 working days, up to a maximum of EUR 100,000 (unless otherwise provided), subject to certain conditions and limits. An additional repayment

Banco Bradesco Europa SA
25, rue Edward Steichen,
L-2540 LUXEMBOURG
GRAND-DUCHÉ DE Luxembourg
TEL.: (+352) 25 41 31
TEL. Brazil: 0800 721 8850 (Toll Free)
SWIFT: BBDE LU LL
E-mail: info@bradesco.lu

deadline (up to three months) can also exist for temporary high balances.

The Luxembourg Investor Compensation Scheme ("SIIIL") covers investors, physical persons and legal entities. The main purpose of the SIIIL is, in case of failure of the custodian institution, to ensure compensation of investors, physical persons and legal entities up to a maximum of EUR 20,000.

For additional information on the FGDL and SIIIL, please consult the official website at the following link: <http://www.fgdl.lu/en/>

Complaints handling

The Bank has reviewed the procedure to receive and manage clients complaints, in line with the regulation issued by the CSSF.

The procedure is available at www.bradescoeuropa.eu or upon request.