

# **INFORMATION ON ACCEPTED/PROVIDED INDUCEMENTS**

Generali Investments CEE, investiční společnost, a.s.

Na Pankráci 1720/123, 140 21 Prague 4, Czech Republic

Company ID No.: 43873766

## Generali Investments CEE, investiční společnost, a.s.

Na Pankráci 1720/123, 140 21 Praha 4

IČO: 43873766



# **Table of contents:**

1	INTRODUCTION	3
2	SUMMARY OF TERMS AND ABBREVIATIONS	3
_	GENERAL INFORMATION ON INDUCEMENTS AND ADMISSIBILITY OF UCEMENTS	3
4	PROVIDED INDUCEMENTS	4
5	ACCEPTED INDUCEMENTS	4

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#### 1 Introduction

The Information on Accepted/Provided Inducements of the Company Generali Investments CEE, investiční společnost, a.s. (hereinafter the "*Information on Inducements*") has been prepared in compliance with the law of the Czech Republic and with the EU legislation as of the 15<sup>th</sup> January 2020. The Information on Accepted/Provided Inducements is available on request in the registered office of the company or at its website http://www.generali-investments.cz.

Generali Investments CEE, investiční společnost, a.s. reserves the right to amend or supplement the Information on Accepted/Provided Inducements at any time without prior notice.

The Client will be informed in advance of any important changes.

Any capitalized terms used in this document have, for the purposes of this document, the meaning defined in the Business Terms and Conditions Regulating the Provision of the Investment Services of Asset Management and Investment Advisory Generali Investments CEE, investiční společnost, a.s., unless stipulated otherwise herein below.

#### 2 Summary of Terms and Abbreviations

**Company** – Generali Investments CEE, investiční společnost, a.s., Company ID No.: 438 73 766, with its registered office at Na Pankráci 1720/123, 140 21 Prague 4, Czech Republic, entered in the Commercial Register administered by the Municipal Court in Prague, Section B, Dossier No. 1031

Client – natural or legal person in a contractual relationship with the Company regulating the provision of investment services consisting in the management of the client's assets, receiving and transmitting orders relating to investment instruments or investment advisory services in terms of Section 11(1)(c) and (f) of the AICIF irrespective of the client's categorisation.

AICIF - Act No. 240/2013 Coll., on Investment Companies and Investment Funds, as amended

**ACBCM** - Act No. 256/2004 Coll., on Conducting Business on the Capital Market, as amended

### 3 General Information on Inducements and Admissibility of Inducements

An Inducement means any fee, consideration, remuneration, monetary or non-monetary benefit received, offered or provided in the provision of investment services between the Company and a third party. If the third party is a member of the same financial group, the Inducement is assessed according to the same criteria.

An Inducement is acceptable if:

- a) The Inducement is designed to enhance the quality of the relevant service and does not impair compliance with the Company's duty to act with professional care, i.e. professionally, honestly and fairly (inter alia) and in accordance with the best interest of the Clients.
- b) The Inducement enables or is necessary for the provision of investment services and cannot, by its nature, give rise to conflicts with the Company's duty to act with professional care.

A consideration or any other monetary or non-monetary benefit received from or provided to the Client or a person acting for the Client's account shall not be deemed an Inducement.

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#### 4 Provided Inducements

The Company may offer and provide, in connection with the provision of investment services, minor non-monetary benefits that are capable of enhancing the quality of the provided service and are of a scale and nature such that they could not be judged to impair compliance with the Company's duty to act with professional care in the interest of the Client, providing the Client is clearly informed thereof. Minor non-monetary benefits include especially, without limitation:

- a) Information or documentation which relates to an investment instrument or an investment service, is generic in nature or adjusted (personalized) to reflect specific requirements,
- b) Participation in conferences, seminars and other training events focused on the features (qualities) of a specific investment instrument or an investment service,
- c) Hospitality of a de minimis value offered during a business meeting or a conference, seminar or other training events, and other minor non-monetary benefits an overview of which is published by the Czech National Bank at the CNB website.

The Company is entitled within the investment service receiving and transmitting orders relating to investment instruments to provide third parties with inducements consisting of fee for execution of received orders, which were transmitted for execution to third party. Those inducements are permissible according to Section 15 (4) let. b) of ACBCM.

### 5 Accepted Inducements

The Company does not accept any inducements in connection with the provision of investment services other than minor non-monetary benefits that are capable of enhancing the quality of the provided service and are of a scale and nature such that they could not be judged to impair compliance with the Company's duty to act with professional care in the interest of the Client, providing the Client is clearly informed thereof. Minor non-monetary benefits include especially, without limitation:

- a) Information or documentation which relates to an investment instrument or an investment service, is generic in nature or adjusted (personalized) to reflect specific requirements,
- b) Documents from third parties that were commissioned and paid for by a corporate issuer or a potential issuer to promote a new issuance of the issuer, or where a third party is contractually engaged and paid by the issuer to produce such a document on an ongoing basis, provided that the relationship is clearly disclosed in the document and that the document is made available at the same time to all securities brokers/dealers wishing to receive it or to the general public.
- c) Participation in conferences, seminars and other training events focused on the features (qualities) of a specific investment instrument or an investment service,
- d) Hospitality of a de minimis value offered during a business meeting or a conference, seminar or other training events, and other minor non-monetary benefits an overview of which is published by the Czech National Bank at the CNB website.

Particulars concerning any Inducement (primarily the amount or value or, as applicable, the method of determining the amount or value of the Inducement) are communicated to the Client on request.