

Inducement Policy

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Policy relating to inducements (fee, commission or non-monetary benefit paid or received to/from a third party)

The company guarantees transparency with respect to remuneration, commissions and monetary and other benefits paid and received within the framework of any investment service provided to its Clients.

By "inducement" we mean any monetary or non-monetary benefit, any indirect remuneration or retrocession paid, provided or received that is related to the provision of an investment service or related service.

As an investment company, distributor of investment products or asset manager, the company is subject to MiFID and UCITS regulations among others.

Inducements received

Immediately upon the MiFID II regulation entering into force, any inducement paid by a third party will be refused, regardless of the type of service provided. Any indirect remuneration that may nonetheless be paid to it in this context will be returned to the client in question without delay.

Only minor non-monetary inducements will be accepted, such as the supply of informative documents, participation in conferences, seminars, meetings and other informative events.

Non-monetary benefits offered by suppliers may take the form of services related to research, training and sales. The company has decided to refuse all inducements, including those that might take the form of research. Research benefiting the company and its teams will thus be entirely paid for by the company, out of its own resources.

In certain circumstances, the company may pay certain commissions to third parties within the framework of services provided.

Inducements paid

Under certain conditions and in certain cases only, the company may share with business finders part of the commissions it has invoiced its Clients.

This remuneration may be calculated based on the work provided by the finder, while also accounting for commissions or entry fees received or the amount of assets under management.

This commission is designed to enhance the quality of the service offered to the Client to the extent that the finder intervenes, among others:

1. in order to help the client formulate its needs and select from different types of services and providers, and to facilitate and enhance relationships between the company and the Client by positioning himself or herself as the Client's preferred contact with the company;
2. to provide the company, if necessary, with information on the Client's evolving situation, which allow the company to tailor and improve the services it provides;
3. to facilitate communication between the Client and the company.

The remuneration of the finder may not have the effect of increasing the cost of the service to the detriment of the client. Its purpose is to split the remuneration between the company and the finder.

For more complete information on the calculation methods used and details relating to non-monetary remuneration, commissions and benefits paid and received within the framework of certain services we provide, CapitalatWork Foyer Group S.A. invites you to contact your advisor.

In the rare cases where inducements are tolerated, the company will always ensure that all of the following conditions are met:

1. The purpose of the inducement must be to enhance the quality of the service in favour of the investor, it must be proportional.
2. The inducement must be disclosed to the investor in advance. The investor will receive at least annually a detailed report of the inducement paid or received.
3. The inducement must be designed such that it does not impair the desire to act in the best interests of the client.