INSINGER GILISSEN
A QUINTET PRIVATE BANK

PROTECTION FOR YOUR ASSETS

Securities Giro Act

Deposit guarantee scheme

Investor compensation scheme

DRAFT

GENERAL

We, InsingerGilissen, are a Dutch branch office of Quintet Private Bank (Europe) S.A. (hereafter Quintet) and our registered office is in Luxembourg. Quintet holds a banking licence under Luxembourg law and as its Dutch branch office we operate under this banking licence. The assets you hold at our bank are protected in a variety of ways if Quintet goes bankrupt.

InsingerGilissen comes under the protection of the Dutch Securities Giro Act (Wge), the Luxembourg deposit guarantee scheme and the Luxembourg investor compensation scheme. The latter two schemes work on the basis of compensation. This means that if Quintet were to go bankrupt, you would potentially be eligible for compensation up to a fixed maximum amount. You can read more on the three protection schemes below, including our Frequently Asked Questions (FAQs) section.

Quintet Private Bank (Europe) S.A. has several branch offices and also operates under other names, such as InsingerGilissen, InsingerGilissen Services, Merck Finck and Puilaetco. If you hold account balances under these trading names or at other branch offices of Quintet, these combined account balances are covered up to a maximum of €100,000.

If your assets are invested in a fund structure at InsingerGilissen, the cash portion that is held in the fund structure does not come under the deposit guarantee scheme.

SECURITIES GIRO ACT (Wge)

The investments you hold in an account at our bank in the Netherlands are eligible for protection under the Securities Giro Act (Wge). The Wge protects investors against the repercussions of bankruptcy of the bank at which their investments are held. Under the Wge, our client's investments are separated from the bank's assets. If Quintet were to go bankrupt, the investments we hold in the Netherlands on your behalf would fall outside the bank's liquidation assets[1]. This also applies to Exchange-traded Derivatives (standard contracts that can be traded on a trading platform), such as options and futures.
OTC Derivatives (over-the-counter derivatives concluded directly with us), such as forward exchange contracts, do not come under this protection.

MiFID2 Regulations require Quintet to separate the securities deposited by clients from its own equity (the segregation rules). The Luxembourg supervisory authority (Commission de Surveillance du Secteur Financier, CSSF) and an external auditor annually assess whether Quintet complies with these asset segregation rules.

A small number of investments are still held at our separate depositary companies. These depositary companies are legal entities that have been set up especially for this purpose. The assets of these depositary companies are therefore separated from the bank's assets. If Quintet were to go bankrupt, the investments at the depositary companies would fall outside the bank's liquidation assets. As the Wge offers sound legal protection in the event

[1] Quintet is classified as a broker (please see art. 1 of the Wge for the definition). The Explanatory Memorandum to the Wge stipulates that Quintet, as a foreign bank that is licensed to provide investment services in the Netherlands (via its branch office InsingerGilissen) and administers accounts in financial instruments on behalf of clients in the Netherlands, comes under the scope of the Wge. Under private international law applicable in the Netherlands, the Dutch property-law regime applies with regard to the Wge (please see art. 16 of the Law of Property (Conflict of Laws) Act). This means that if Quintet were to go bankrupt, on liquidation of Quintet it will be acknowledged that the securities held in accounts in the Netherlands do not form part of the assets of Quintet.

of the bank going bankrupt, only a small number of investments are held at our depositary companies. Our aim is to wind up these depositary companies in the long term.

DEPOSIT GUARANTEE SCHEME

The Luxembourg deposit guarantee scheme applies to our bank. This guarantee scheme is identical to the Dutch scheme because the guarantee schemes are harmonised under European law. The main difference is the party that implements the scheme. In our case this is the *Fonds de Garantie des Dépôts Luxembourg (FGDL)*, of which Quintet is a member.

If Quintet were to go bankrupt, your account balances are guaranteed up to a maximum of €100,000 per accountholder, per bank. It makes no difference how many accounts you hold at Quintet. Any accounts you hold at other (foreign) Quintet branch offices will also be included when calculating the compensation.

You will be eligible for reimbursement under the deposit guarantee scheme if:

- the scheme's rules apply to us; and
- your money can be reimbursed in accordance with the scheme's rules; and
- you are an accountholder to whom reimbursement may be made under the scheme's rules.

INVESTOR COMPENSATION SCHEME

Your securities are guaranteed by the *Système d'indemnisation des investisseurs Luxembourg* (Luxembourg investor compensation scheme, or SIIL), of which Quintet is a member. This scheme is identical to the Dutch scheme and protects individuals and small businesses that hold financial instruments (such as securities) at banks and that do not already come under the protection of the Wge.

If Quintet were to go bankrupt, your financial instruments[2] would fall outside the bank's liquidation assets and be returned to you under the Securities Giro Act (Wge). In exceptional situations, it may prove impossible to return some of these financial instruments, for instance because of fraud or if InsingerGilissen has not complied with the rules on the separation of assets. The investor compensation scheme will also enter into force if you hold financial instruments in your account that do not come under the protection of the Wge, such as positions in precious metals in book-entry form. In such cases, the scheme pays maximum compensation of €20,000 per person, per bank.

[2] As stipulated under a, b and c of the definition of a financial instrument in art. 1:1 of the Wft (Act on Financial Supervision). This relates to securities, money market instruments and participation rights in an investment institution or UCITS that are not classed as securities, at all times within the meaning of art. 1:1 of the Wft. If registered securities are involved, the delivery of which requires a notarial deed and of which the transferability is limited or excluded in the articles of association or terms of issue, the securities do not come under the Wge (pursuant to art. 8a of the Wge).

FREQUENTLY ASKED QUESTIONS (FAQs)

SECURITIES GIRO ACT (Wge)

1. **How is the separation of assets effected?**
   The separation of assets is achieved either because your securities are held under the Wge or by holding them at one of our depositary companies. In both cases, your securities do not form part of the bankrupt bank's assets and you can have the securities transferred to a different bank or investment firm.

2. **What is the Securities Giro Act?**
   The Securities Giro Act (Wge) protects investors with a securities account in the Netherlands against the repercussions of the bank going bankrupt. Banks must separate their clients' securities from their own assets so that if a bank goes bankrupt the securities belonging to its clients fall outside the bank's liquidation assets.

3. **Who is protected?**
   This protection applies to all our clients who hold their securities at our bank or at one of our depositary companies. No distinction will be made between private, business or professional investors, or on the basis of nationality, place of residence or age.

4. **What is the maximum amount of compensation?**
   This protection does not work on the basis of the payment of compensation. Your investments fall outside the bankruptcy process. This means that your total position in investments held at our bank is protected under this law.

5. **Which products/accounts are protected?**
   Almost all securities, such as tradable equities and bonds, come under this protection. Derivatives that can be traded on a stock exchange also come under the protection of the Wge. This protection does not apply to any OTC Derivatives you conclude in which we are the counterparty.

6. **Which positions in derivatives are protected by the Wge?**
   Exchange-traded Derivatives are protected under the Wge against the repercussions of our bank going bankrupt. If we were to go bankrupt, you could have these Exchange-traded Derivatives transferred to a different bank. This is provided for in the Wge.

   OTC Derivatives (such as forward exchange contracts, also known as FX Forwards) are not protected under the Wge in the event that Quintet goes bankrupt. In this case, you have an unsecured claim against Quintet's assets. This means that you, together with others, still have a claim against Quintet's assets. Whether you are reimbursed depends on the proceeds from the sale of the assets and how many other people also have a claim.

7. **Is collateral (margin) protected under the Wge?**
   If you conduct transactions in derivatives, you sometimes need to provide us with collateral. This might take the form of cash or securities in your account. Your rights and obligations arising from the derivative transactions and any collateral you have provided come under our separate derivative assets. If you use securities as collateral for the obligations arising from the derivative position, these securities are also protected under the Wge.

   If this collateral has been provided in the form of cash, it is possible that not all of it will come under this protection. Collateral in the form of cash is only protected by the Wge insofar as it serves as collateral for your obligations arising from the Exchange-traded Derivatives. Any cash that has been deposited as (extra) collateral on top of the amount that had to be deposited based on the corresponding position in Exchange-

traded Derivatives is protected by the deposit guarantee scheme, up to a maximum of €100,000 per accountholder.

DEPOSIT GUARANTEE SCHEME

1. **What is the deposit guarantee scheme?**
   The deposit guarantee scheme aims to protect accountholders at banks. If Quintet were to go bankrupt, under this scheme you would be protected up to a maximum amount.

2. **Who is protected?**
   The deposit guarantee scheme applies to almost all natural persons and legal entities with an account at our bank. This goes for adults and minors alike, but also for sole proprietorships and legal entities such as public limited companies, private limited companies or foundations. Please note: if the owner of a sole proprietorship also holds a personal account at our bank, the account balances are added together.

   Anyone in a general or limited partnership may also appeal to the deposit guarantee scheme as a natural person.

3. **Who is not protected?**
   Financial institutions (such as investment firms and pension funds) are not protected. The same goes for governments and unincorporated enterprises (such as general partnerships and limited partnerships).

   Anyone who has not identified themselves in compliance with article 4, paragraph 1 of the Anti-Money Laundering and Anti-Terrorist Financing Act is also not protected.

4. **What is the maximum amount of compensation?**
   The scheme guarantees account balances up to a maximum of €100,000 per accountholder, per bank. It makes no difference how many accounts you hold at our bank. In our case, Quintet holds the banking licence and is a member of the Luxembourg deposit guarantee fund (FDGL). Any accounts you hold at other (foreign) Quintet branch offices will also be included when calculating the compensation.

   If, for example, you hold €200,000 at Quintet, spread across several accounts and different branch offices, you will receive maximum compensation of €100,000.

   If you hold in excess of €100,000, you are an unsecured creditor against the bank's liquidation assets for the amount above €100,000. This means that you, together with others, still have a claim against the bank's assets. Whether you are reimbursed depends on the proceeds from the sale of the assets and how many other people also have a claim.

5. **Which branch offices does Quintet have?**
   When determining the amount of compensation, you first need to establish which branch offices and trading names operate under Quintet's banking licence. Any account balances you hold at these parties are added together to determine the amount of compensation.

   In addition to InsingerGilissen as its branch office in the Netherlands, Quintet has branch offices that include Merck Finck (Germany), Puilaetco (Belgium), Quintet España and Quintet Denmark. Quintet also uses different trading names, such as InsingerGilissen Services in the Netherlands.

6. **Which products/accounts are protected?**
   All the payments and savings accounts, cash accounts and term deposits we offer come under the deposit guarantee scheme. Account balances held in a different currency (e.g. GBP or USD) are also covered. Please remember that any compensation will always be paid in euros.

7. **Which products/accounts are not protected?**

Account balances invested in equities, options, futures and other financial instruments or account balances housed in life insurance policies, pensions and annuities do not come under the deposit guarantee scheme.

This also applies to subordinated deposits, debt instruments issued by Quintet, virtual currencies and instruments that come under the definition of eligible own funds within the meaning of the Capital Requirements Regulation.

8. **How does the deposit guarantee scheme work for joint accounts?**
If an account is held in the name of more than one person, each person is eligible separately for compensation under the scheme. The guarantee applies proportionally, unless otherwise stipulated contractually. In the case of a joint account with two accountholders, in principle both will be able to submit a claim for half of the account balance up to a maximum of €100,000 per person.

Example
Two accountholders have a joint account with a balance of €150,000 and one of them also holds a personal account with a balance of €60,000 at InsingerGilissen. Under the deposit guarantee scheme, the first accountholder will be paid compensation of half of €150,000 (€75,000). The second accountholder has a total claim of €135,000 (half of the balance in the joint account (€75,000) + the balance in the separate account (€60,000)). Under the scheme, he or she will receive maximum compensation of €100,000.

9. **How does the protection work in the case of legal representation?**
If you are acting on behalf of an accountholder, for instance as the parent of a minor, or as a guardian or administrator, you will not be eligible for compensation. The accountholder on whose behalf you are acting is eligible for compensation, however.

10. **How does the protection work if the accountholder is not the beneficiary (e.g. in the case of a trust or inheritance)?**
When an accountholder is not the beneficiary of the balance in the account, the person who is the beneficiary is eligible for compensation, on condition that he or she has identified themselves or is identifiable. Their identity must be established before the scheme can enter into force.

If there are several beneficiaries, they are each eligible separately for compensation under the scheme. The *Fonds de Garantie des Dépôts Luxembourg* (FGDL) works on the basis of an equal share for each beneficiary, unless otherwise stipulated contractually.

More information can be found on the FGDL website:
http://www.fgdl.lu/en/depositors-corner/frequently-asked-questions/

11. **What do I need to do to receive compensation?**
The deposit guarantee scheme will be activated as soon as Quintet goes bankrupt. In general, the FGDL is obliged to transfer the money to you within seven days of the scheme being activated. This is on condition that you have notified the FGDL of your new bank account number and that the right to compensation has been established and validated. Longer time limits may apply or reimbursement may be delayed in some specific cases.

The FGDL will inform you by post (accompanied by a form requesting specific information, such as your new bank account number) and via its website of the exact procedure that needs to be followed in order to claim compensation from the FGDL.

More information on the FGDL and the protection offered by the scheme can be found in our new Deposit Information Sheet and on the following websites (in English):

- http://www.fgdl.lu/en/the-fgdl/
- https://www.cssf.lu/en/protection-of-depositors/

12. **Are clients' debit and credit balances set off against each other?**

Any negative (debit) balances in your (payments) account at our bank will not be set off against your credit balances at our bank. Our claims on you, such as mortgage debt, are in principle not set off against the amount to be paid to you. The exception here is savings-based mortgages. Savings accounts for your own home are set off against the mortgage debt on this property.

INVESTOR COMPENSATION SCHEME

1. **What is the Luxembourg investor compensation scheme?**
   The investor compensation scheme protects investors, natural persons and businesses that have invested cash and/or financial instruments (such as equities, options and investment funds) at the bank, up to a maximum of €20,000. The Luxembourg investor compensation scheme is guaranteed by the *Système d'indemnisation des investisseurs Luxembourg* (SIIL), of which Quintet is a member.

2. **Who is protected?**
   The Luxembourg scheme protects investors who hold investments at (a branch office of) a Luxembourg bank.

   Some parties will not be eligible for compensation under Luxembourg law. These include the directors of banks experiencing payment difficulties and anyone who holds an interest of five percent or more in such banks. Nor is immediate family of these persons eligible. Financial institutions (such as investment firms and insurers) and institutional parties (such as pension funds and UCITS) are also not eligible.

3. **Does it matter in whose name the account is held?**
   In order to be eligible for protection under the investor compensation scheme, the account needs to be in your name. You will therefore not be eligible if you are a legal representative (for instance a parent, authorised representative or administrator). The person (or persons) you represent is eligible for compensation, however.

4. **What is the maximum amount of compensation?**
   The investor compensation scheme guarantees a maximum of €20,000 per person, per bank.

5. **Which products/accounts are protected?**
   The protection applies to cash and/or financial instruments you have entrusted to us on the basis of an investment service. Examples of such instruments include equities, bonds, options and futures.

6. **Are investment losses also protected?**
   Losses on your investments are not eligible for compensation. Nor are you protected if the company that issued the security goes bankrupt or otherwise gets into difficulties.

7. **How does the investor compensation scheme work for joint accounts?**
   If an account is held in the name of more than one person, each person is eligible separately for compensation under the scheme. The compensation applies proportionally, unless otherwise stipulated contractually. In the case of a joint account with two accountholders, in principle both will be able to submit a claim for half of the account balance. They can each receive a maximum of €20,000.

8. **What do I need to do to receive compensation?**
   In general, you will receive compensation as quickly as possible and within three months at the most once your right to compensation has been established and validated. Longer time limits may apply or reimbursement may be delayed in some specific cases.

   Your compensation claim must be submitted within ten years, calculating from the date on which it was established that Quintet is no longer able to meet its commitments, or from the date on which the ruling governing the suspension of payments was issued, or liquidation of the bank was made public.

More information on the SIIL and the protection offered by the investor compensation scheme can be found on the following websites (in English):

- https://www.cssf.lu/en/protection-of-investors/
- http://www.fgdl.lu/en/the-fgdl/

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