

## Detailed information on iWealth Management Sp. z o.o. and services provided

### 1. Company, offices, address, contact details

Company:	iWealth Management Sp. z o.o. ("iWealth")
Registered office/address:	al. Armii Ludowej 26, 00-609 Warsaw (FOCUS building)
Registration:	KRS 0000381507 kept by the District Court for the Capital City of Warsaw 12 <sup>th</sup> Economic Division of the National Court Register in Warsaw
Phone number:	+48 606 697 070
Website:	<a href="http://www.iwealth.pl">www.iwealth.pl</a>
E-mail address:	<a href="mailto:kontakt@iwealth.pl">kontakt@iwealth.pl</a>

### 2. Licences held and services provided

iWealth holds a permit issued by the Polish Financial Supervision Authority (permit no. DFI/I/4031/5/19/12/U/MK of 24 September 2012) to carry out brokerage activities for Investment Funds Companies ("TFI") in the scope of sales and repurchase of participation units or shares.

iWealth's activity is subject to the supervision of the Polish Financial Supervision Authority and governed by the Act on investment funds and management of alternative investment funds (as published on 07 June 2018 in Dz.U. [Polish Journal of Laws] item 1355).

At iWealth, clients have access to a wide range of Polish and international investment funds. Our brokerage services include in particular:

- presenting to the clients the offer of various funds available on the market plus detailed explanation of their investment policy and historical performance,
- providing comprehensive information on the principles of participation in selected funds, fees charged and TFI charges for fund management,
- accepting from clients and transferring for further processing orders for purchase, repurchase/redemption, conversion/exchange and other declarations of will regarding shares in funds,
- receiving and processing complaints, if any (see item 6),
- updating client data collectively in all supported funds,
- title transfer services for beneficiaries and heirs,
- accepting powers of attorney, excerpts from registers indicating the rules of representation,
- establishing a blockade or pledge on participation units or shares.

An important addition to our brokerage service is wealth management support, including **free advice** to clients in relation to participation units or shares, i.e. analysis of client's financial situation, investment goals and horizon, as well as risk propensity in order to recommend the investment funds which respond best to client's needs. In the future, iWealth will offer a comprehensive package of consultancy services for a wider range of investment products.

iWealth **does not accept payments** for the purchase of units or shares, and it **does not transfers payments** for repurchased/redeemed units or shares at client's request.

### 2. How to contact iWealth

- Personal contact with your Wealth Manager in iWealth offices listed on the website or in another place that is convenient for the client (subject to prior arrangement)
- by phone: +48 606 697 070
- via e-mail: [kontakt@iwealth.pl](mailto:kontakt@iwealth.pl)

## 4. Financing distribution services at iWealth

In line with the recently adopted statutory regulations related to the investment fund market, iWealth can finance its activity of a distributor of investment fund participation units and shares from the following two sources:

- 1) Distribution fee (one-off administration fee) charged to the client who purchases the investment fund participation units and shares, dependant on the order value, as per the fee chart of a given fund. This fee may be periodically reduced or cancelled during promotional campaigns or as a part of systematic saving plans (in such a case, iWealth receives via TFI the actually collected sum), and
- 2) Reimbursement of some business expenses from TFIs; such reimbursement is admissible only in relation to the expenses that are directly related to increasing the iWealth client service above the standard benchmark of distributor's service, i.e. accepting and processing of basic orders. The above-standard quality of iWealth services means:
  - a) Post-sales Client service including the performance of a comprehensive set of instructions,
  - b) Developing and maintaining organizational and technical structure to enable our clients to contact iWealth in the most convenient way:
    - Free of charge access to iWealth Online: a web service for investment monitoring (current status of assets, real-time value of participation units and shares held by the user etc.) and portfolio management thanks to the possibility of making online orders and instructions;
    - A stable network of specialists all around Poland, thanks to which we assign to each our Client a dedicated Wealth Manager, who will provide iWealth services in the time and place convenient for the client;
  - c) Free of charge investment consultancy service in the form of model portfolios adjusted to the client,
  - d) A wide offer of various TFIs (open architecture), all of them verified on an ongoing basis in order to avoid selling products of TFIs whose reputation is not sufficiently high.

TFIs thoroughly verify and check the transactions performed by iWealth and documentation of expenses. iWealth divides the actual expenses among TFIs, based on the generally accepted key, namely depending on the value of clients' assets gathered for the benefit of each fund, which means that the amount of expenses stipulated in p.2) above is directly contingent on the level of assets gathered for a given fund. Any expenses which exceed the remuneration limits specified by TFIs are covered by iWealth, from other resources.

It should be emphasised that thanks to this mode of settlement clients can be sure that iWealth does not obtain significantly higher profit from providing brokerage services for the benefit of only some TFIs, at the expense of others.

Upon request, iWealth will provide the client with detailed information on the calculation of expenses related to increasing the service quality.

## 5. How to make orders and instructions

Our Clients can make orders and instructions regarding fund participation units and shares in two ways:

- via their dedicated Wealth Managers
- using iWealth Online transaction and information service, available free of charge after registration (concluding an agreement with iWealth regarding the use of the website) at [online.iwealth.pl](https://online.iwealth.pl)

## 6. Basic principles of providing services

iWealth provides services based on the principles set out in internal regulations and procedures, including *Terms and conditions of brokering and repurchase of participation units or participation titles*. Orders and instructions, including deposits and withdrawals, are handled by a transfer agent in line with the principles specified by TFIs, contained in the constitutional documents and prospectuses of individual funds.

The list of Investment Fund Companies that manage the funds whose participation units and shares are

distributed by iWealth is available at [www.iwealth.pl](http://www.iwealth.pl), via iWealth Online, and by iWealth Representatives. Before accepting the first order from the Client, an iWealth Representative provides a full list of funds on offer.

## 7. Complaints

The client may file complaints against iWealth regarding the services provided by iWealth and by the funds subject to iWealth distribution (complaints). This can be done as follows:

- in person at the Branch or in the main offices of iWealth (in writing or orally - for the record)
- by post (courier or post) with a confirmation of receipt
- via e-mail to the address [reklamacje@iwealth.pl](mailto:reklamacje@iwealth.pl)

If the complaint concerns iWealth's activity, the answer is sent by post (in the case of a complaint made in writing or by post) or via e-mail (in the case of a complaint filed this way), unless the client indicates a different form of contact in connection with the complaint, no later than within 30 calendar days from the date of its receipt by iWealth. In particularly complex circumstances that prevent the complaint from being processed within 30 days, iWealth explains the reason for the delay and indicates the circumstances that must be determined and the expected date of response in writing which may not exceed 60 calendar days.

To enable smooth processing, each complaint should include: client's full details, details of the operation or service being the subject of the complaint, register number, the date of placing the order or instructions, client's request (e.g. payment), and in the case of a payment request - determining the claim and the calculation method, as well as the bank account number. If all information is missing, iWealth asks the client to supplement it.

If the complaint does not concern the scope of iWealth's activities but concerns the fund or its transfer agent, such a complaint is immediately forwarded to the appropriate entity (in accordance with a specific iWealth distribution agreement with a given TFI), about which the Client is informed by e-mail or post. In this case, the complaint is further investigated and the answer is provided by the relevant entity, i.e. TFI or transfer agent. The client can contact TFI or a transfer agent individually or via iWealth.

If the TFI/transfer agent does not respond within the statutory period of 30 days from the moment the complaint is filed by the client and fails to inform the client about the need to extend the deadline for response due to the complicated nature of determinations to be made, then the complaint is considered to be settled according to the client's will pursuant to Art. 8 of the *Act of 5 August 2015 on handling complaints by financial market entities and on the Financial Ombudsman* (the Client obtains the right to apply to the TFI/transfer agent for payment of the amount of the claim).

If the claims contained in the complaint by TFI or transfer agent are not accepted and settled, the client has the right to:

- appeal against the decision contained in the response in accordance with the procedure provided for in the constitutional documents of the entity which responds to the complaint;
- use mediation, arbitrary court or other mechanism of amicable dispute settlement (if the responding entity provides for such a method of dispute settlement);
- apply to the Financial Ombudsman, as per the Act specified above.

iWealth will make every effort to process complaints in a reliable and timely manner, with full objectivism and professionalism.

Moreover, the client can file a complaint with iWealth regarding the reliability and professional attitude of an iWealth Representative. The complaint settlement procedure shall apply accordingly.

## 8. Conflicts of interest

iWealth has an internal policy of conflicts of interest management, under which it undertakes actions that are necessary to prevent conflicts of interest, and which determines the measures and procedures of conflicts of interest management, if the need arises. Detailed information on our procedure in the event of a conflict of interest is available upon request.