



*WESTERN UNION INTERNATIONAL BANK GMBH,
ORGANIZAČNÍ SLOŽKA*

Financial Services Guide

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1. Information about this Financial Services Guide

This Financial Services Guide (FSG or the "Guide") will provide general information about Western Union International Bank GmbH, organizační složka ("Branch") and its services to you. This FSG contains information about:

- who we are;
- how we can be contacted;
- what services we are authorised to provide to you;
- the financial products to which those services relate;
- how we categorize our clients;
- how we structure the remuneration for our services;
- how we protect clients funds we potentially hold;
- how we handle potential source of conflicts of interest when we provide services to our clients; and
- how we handle complaints.

In addition to this FSG you will receive the following documents including information about our services:

- Product Disclosure Statement(s), that include(s) a detailed description of the products we offer as well as the advantages and risks involved with these products;
- Terms and Conditions;
- Fee Schedule

Any fees described in this FSG are inclusive of VAT, where VAT is applicable.

Where the terms WUIB, we, us, our, or Western Union Bank are used in this Guide, it refers to Western Union International Bank GmbH (Austria), its branches, in particular Western Union International Bank GmbH, organizační složka operating in the Czech Republic, its successors and/or assigns, as well as its officers, directors, employees and agents. References to you, your, the customer are references to the reader, the reader's business, and any person authorised by you to transact on your behalf with WUIB.

2. About Western Union International Bank GmbH, organizační složka

Western Union International Bank GmbH was established in 2004, in order for Western Union to offer our private and business clients a wider range of quality products and services. Western Union International Bank GmbH is a fully licensed bank with its registered seat in Austria. Besides the Austrian banking market, we are active through our branches and affiliated companies also in other European countries (for example France, Germany, Poland and the Czech Republic). In the Czech Republic, Western Union International Bank GmbH operates through its branch Western Union International Bank GmbH, organizační složka.

As the international banking arm of Western Union, WUIB is traditionally known for its business activities in the area of consumer banking services, especially international money transfers. In accordance with the business strategy of the Western Union Group, WUIB has extended its services portfolio offering ancillary foreign currency services to the money transfers. Accordingly we provide solutions for companies or sole traders that need to pay for foreign invoices or to exchange foreign receivables. Our clients include corporations and entrepreneurs without any limitation to industry. We are able to serve everybody from farmers and craftsmen to airlines and steel mills. These products are offered under the Western Union Business Solutions (WUBS) brand.

The following WUBS foreign currency services are offered by WUIB:

- International funds transfers;
- FX Spots;
- forward foreign exchange contracts;
- Future Payments Transactions;
- Option Contracts.

For contact details please see section 15 below.

3. Austrian Banking License

Western Union International Bank GmbH holds an Austrian Banking Licence, dated with 13. October 2004 which authorises it to provide the financial services described in section 5 below. Please also see <https://www.fma.gv.at/en/search-company-database/> for further information. WUIB has passported this license for the Freedom to Provide Services in 29 states within Europe and additionally offers these services through branches in the Czech Republic, France, Germany, Italy, Poland and the United Kingdom and will look to broaden this branch network in the future.

In the Czech Republic, Western Union International Bank GmbH operates through its branch under the single European licence (*jednotná licence*) regime provided for by Sec 5c to 7a of the Czech Banking Act. In certain aspects, including the provision of payment services under Part Fourth of the Czech Payment Services Act and conduct of business rules provided for § 15 et. seq. of the Czech Capital Markets Act it is supervised by the Czech National Bank (*Česká národní banka*).

Our Austrian Head Office address as well as contact details of the Austrian Financial Market Authority are set out on the final page of this FSG. Also Czech Branch Head Office address as well as contact details of the Czech National Bank are set out on the final page of this FSG.

4. How do we communicate?

You can contact us by telephone, e-mail, fax or by post-mail. You will find the contact details are at the end of this FSG.

The method of communication will typically be e-mails and telephone conversations. Orders will regularly be sent and received over telephone, as you contact your Contact Person (Client Manager) or via the WUBS online platform. Communication will be provided to your e-mail address if provided to us. Information on status of your transactions and funds can be drawn over the individual profile on the WUBS online platform or through the Contact Person at any time.

Under applicable law WUIB cannot provide investment services by telephone if the conversations are not recorded. For the above reason, the telephone conversations are recorded with your notice and consent.

You can communicate with us in one of the following languages: Czech and English.

5. What investment services are we authorized to provide?

Our banking licence authorises us to provide you with investment services. The following investment services may be provided in connection with foreign exchange financial instruments:

Provision of Investment Advice

Investment Advice means the provision of personal recommendations, either upon the request of a client or at the initiative of WUIB, in respect of one or more transactions relating to financial instruments. We are authorised to provide financial product advice which takes into account your personal circumstances, financial situation or needs in regards to the financial instruments we offer (see section 6 below). Please note, however, it is important to point out that this advice is not independent. The advice we provide is limited to our assessment of the suitability of the products offered by WUIB in meeting the hedging

objectives you describe to us. It does not take into account other products that might be available on the market that may or may not be more suitable for your needs, nor do we offer advice on topics outside of mitigating your currency risk. We also do not provide ongoing periodic statements of the suitability of the financial instruments recommended to you. If you require these services, we recommend you seek independent advice accordingly.

Investment advice may be provided either in written form in a statement of advice (document covering, inter alia, investment advice, merit justification of investment advice, information about the sources for investment advice, and period of validity of investment advice), or in oral form, which will be followed afterwards in a statement of advice on durable medium documenting the Investment Advice provided to You in oral form.

Please note, that we may provide our products with or without investment advice. The Investment Advice will be provided either at Your own initiative or at Our initiative. We may refuse to provide you with investment advice for any reason without justification. If the investment advice is provided to you by us, You are not obliged to follow any investment advice. You are exclusively responsible for taking your investment decisions and for any consequences thereof irrespective of whether you have followed our investment advice or not. We do not charge fees for the Investment Advice provided to You.

Deal in a Financial Instrument

We are authorised to deal on our own account as well as to execute orders of our clients. Execution of orders on behalf of our clients means acting to conclude agreements to buy or sell one or more financial instruments. FX Forward contracts, Future Payments Transactions and Option Contracts are executed solely over-the-counter (OTC, that means outside the regulated market or multilateral trading facility) between the client and WUIB. The counterparty of the customer is in case of forward contract, Future Payments Transactions and Option Contracts always WUIB.

Trading on a Interbank Money Market

We are also authorised to trade with money market instruments on the interbank money market. This enables us to have the necessary flexibility in responding to the needs of our clients.

6. What kind of products do the financial services relate to?

Our Banking Licence passported into the Czech Republic authorises us to provide financial product advice and to deal in relation to various financial products. The following products, including financial instruments according to the Markets in Financial Instruments Directive 2014/65/EU (MiFID) and the respective regulations, are offered to our clients:

- Payment Services;
- Foreign Exchange Forward Contracts;
- Future Payments Transactions;
- Option Contracts.

The products are further described in the relevant Product Disclosure Statement(s) (PDS) and the Terms and Conditions.

7. WUIB's Order Execution Policy

Introduction

In accordance with applicable laws, when executing a Client's order, WUIB is required to act honestly, fairly and professionally in accordance with the best interests of the Client.

WUIB's Order Execution Policy (hereinafter the "policy") has been developed in order to establish the ways to achieve the best possible result when executing customer orders and sets out an overview of WUIB's order handling processes and order execution processes.

The standards contained within the policy are derived from the Markets in Financial Instruments Directive 2014/65/EU and related regulations.

Scope of Application & General Provisions

This policy applies to the entire business relationship between the Client and WUIB in relation to the services that WUIB provides to its Clients.

This policy is reviewed on an annual basis and monitored regularly so as to determine whether the orders WUIB receives from its Clients are properly executed in accordance with this policy.

If WUIB makes any changes to this policy, it will notify Clients of such changes via e-mail. Any changes to this policy will not apply to transactions initiated before the date of change.

Access Channels

WUIB clients can place orders for: (i) FX Forward and Future Payments Transactions via telephone, facsimile, electronic mail or through the WUBS online platform; and (ii) Option Contracts via telephone and electronic mail. Trading over the telephone, facsimile, electronic mail is available during the business hours of WUIB.

Identification of calling clients and verification of the authorizations is done by an identification procedure agreed and set in the contract and the Terms and Conditions.

Each order for FX Forward, Option Contract or Future Payments Transaction shall as minimum requirement contain information on amount, currency and period for which it is concluded. Order for Future Payments Transaction shall beyond these requirements also include identification of a beneficiary of the Future Payments Transaction.

The WUBS online trading platform is available to clients who have signed the necessary documentation. The administration of this internet platform is available 24 hours 7 days in week. Trading using the WUBS online platform will be available 24 hours in each business day.

Transactions concluded via WUBS online platform are processed on the same business day of the request. Other transactions are processed on the same business day of the request if WUIB receives the request before 5 p.m. on a business day (Central European Time).

Execution Criteria

WUIB has incorporated the following relevant orders execution criteria and factors so as to achieve the best possible result:

- Price
- Speed and likelihood of execution
- Size and nature of an order
- Total costs and fees related to the execution of an order
- Conditions for settlement.

In most cases, price will be the most important execution factor. For these purposes, the best possible result will be determined in terms of the total consideration representing the price of the FX Forwards or Option Contracts and the costs and fees related to execution (including all expenses incurred by the customer which are directly related to the execution). WUIB may incorporate other factors and criteria to the extent that they appear relevant to the execution of a certain order if justified by client's interest in order to best execute the order. The WUIB will determine the relative importance of the above factors within its usual business terms and procedures based on its experience, available information and market conditions while considering also the following: (i) the characteristics of the customer, (ii) the characteristics of the order, and (iii) the characteristics of the currency derivative.

Orders for Forwards and Option Contract will be executed at fixed prices the customer agrees upon when he/she makes a request (in case of certain Option Contracts no premium may be payable (a Zero Premium Options)). If for some reason execution was not possible WUIB would immediately notify the client unless applicable law prescribes us to act differently.

Since all Derivative contracts provided by WUIB represent customized OTC financial instruments that involve a unique contractual relationship tailored to the circumstances of the client in the Customer Profile the customer agrees that WUIB does not execute an order of the customer on a regulated market or multilateral trading system. As

a result the “best execution” obligation which generally applies to investment services under the Czech Capital Markets Act is not applicable with respect to the Derivative Contracts.

The client understands and agrees that all the prices and rates quoted by the WUIB are exclusively quoted prices and rates of the WUIB. With regard to this they do not always correspond to otherwise available prices and rates in the market, particularly to prices on markets which are used as reference. The client acknowledges the fact that its transaction concluded with or through/ WUIB can only be executed with WUIB.

Please also see the Product Disclosure Statement for Foreign Exchange Transactions, the Product Disclosure Statement for Option Products as well as the Terms and Conditions. Further details on our Execution Policy will be provided any time on request.

8. How we categorize our clients according to MiFID and what does this imply?

We are obliged to classify Our clients in one of the categories set by the Czech Capital Market Act (Act No. 256/2004 Coll., Capital Markets Act, as amended). The following three categories of clients are set:

- Non-professional Client
- Professional Client
- Eligible Counterparty

Clients of WUIB are categorized either as non-professional clients or professional clients. A professional client will be treated by WUIB as Eligible Counterparty if it is an entity listed in Section 2a(1) of the Czech Capital Markets Act. Non-professional clients are entitled to the highest level of transparency and protection of the MiFID regulations. Professional Clients may be afforded lower levels of transparency and protection on the basis that they are deemed to possess the experience, knowledge and expertise to make their own investment decisions and properly assess the risks.

Non-professional clients

Non-professional clients are natural persons (private individuals, individual entrepreneurs, etc.) as well as legal entities (businesses, associations, etc.) that are not designated as professional clients.

The protection enjoyed by the ‘non-professional client’ includes the following:

- ‘best execution of orders’ on financial products, also concerning the total costs; provisions on processing orders;
- duty to provide certain information about the Service Provider, the protection of funds, the costs of services and risks involved; (please also refer the ‘Product Disclosure Statement’ for detailed information);
- provision of appropriate and suitable products and services;
- provisions on remuneration;
- provisions for an effective Compliant Management; (obligation to treat the client honestly, loyally and professionally);
- obligation to prevent and notify clients about potential Conflicts of Interest; and
- protection of the margin deposits (please refer to the ‘Product Disclosure Statement’),
- protection of your funds (please refer to the Article 11 of the ‘Financial Service Guide’ for detailed information).

The Duty to provide Information and Appropriateness and Suitability Checks:

1) Duty to provide information

We are required to provide you with complete information before the service is rendered to you. Once the transaction has been carried out, we are also required to send you reports on this transaction.

Generally speaking, the information you receive must be precise, correct, clear and non-deceitful. It must enable you to understand the nature of the service with which you are being provided and the type of financial product in which you are going to invest.

Good information must also be without ambiguity in substance as well as in form, particularly with regard to certain items: nature of the financial instrument; existence or non-existence of a guarantee; risk; recommended duration of the investment; expenses; performances. We are required to inform you of the advantages as clearly and completely as possible, but also about the risks resulting from realisation of the operations under consideration.

This obligation to provide information must be met at all times, whatever the method of subscription. In other words, if a financial instrument is subscribed for, it is advisable that you be provided with all documents containing information such that you can read them prior to any subscription. We will also keep you informed of possible developments in the characteristics of the products offered by WUIB, however, already agreed products will not be affected by such developments.

We will provide you with information on executed Forward Contracts, Option Contracts and Future Payments Transactions immediately after its execution in the confirmation of transaction. We will also provide you with annual report of executed Forward Contracts, Option Contracts and Future Payments Transactions including also information which of those have not been settled to the date of the annual report.

2) Verification of the appropriateness and suitability of the service provided

For the services of advisory on financial instruments and execution of orders (please see the definitions above), we are required to request the following information in the form of an 'Appropriateness and Suitability Check':

The clients' knowledge and experience in the investment field relevant to the specific type of product or service, the clients' financial situation and the clients' investment objectives so as to enable the firm to recommend to the client the investment services and financial instruments that are appropriate and suitable for him.

Taking into account type and scale of the service, which is limited to FX-Forward Contracts, Option Contracts and Future Payments Transactions for WUIB at the moment, the Service Provider must be able to assume at its reasonable discretion that transactions meet the following requirements:

1. it meets the clients' investment objectives;
2. any investment risks associated with the transaction are financially feasible for the client in accordance with its investment objectives; and
3. the client is able to understand the risks associated with the transaction based on its knowledge and experience.

If we do not receive the information required when providing services in the form of investment advice, we may not recommend any financial instruments to the client.

Professional clients

The following subjects may be classified as professional clients:

(A) Professional clients by law:

- Legal entities listed as professional clients in Sec. 2a(1) of the Czech Capital Markets Act ("**Status Professional Client**"):
 - o a bank
 - o a savings or a lending co-operative society (in Czech *spořitelní a úvěrní družstvo*)
 - o an investment firm
 - o an insurance company
 - o a reinsurance company
 - o an investment company
 - o an investment fund
 - o a pension company

- another person who is conducting business activity in the financial market on the basis of a licence issued by a financial market supervision authority or on the basis of registration in a register maintained by a financial market supervision authority, in particular payment institution, electronic money institution, small scale electronic money issuer, small scale payment services provider, non-banking consumer credit provider, main administrator, investment intermediary, insurance agent, insurance broker, independent intermediary of consumer credit, independent liquidator of insurance events, operator of payment system with settlement finality, operator of settlement system with settlement finality, central depository, but with the exception of tied proxy of investment intermediary, tied proxy under the consumer credit act, tied proxy of an investment firm, tied proxy of a pension company, tied insurance intermediary, subordinated insurance intermediary and exclusive insurance agent
 - a person whose principal activity is securitization
 - a person who deals with investment instruments on own account with the aim of reducing risk (hedging) from business with investment instruments listed in Sec 3(1) letters d) to k) of the Czech Capital Markets Acts and this activity belongs among his principal activities,
 - a person who deals with investment instruments on own account listed in § 3 (1) letters g) to i) or commodities and this activity belongs among his principal activities,
 - a legal entity, competent to manage the assets of the state when providing the purchase, sale or management of its claims or other activities, or during the restructuralization of business companies or other legal entities with an asset participation of the state,
 - a foreign person that corresponds to any persons referred to in above
 - a state or a member state of a federation
 - the Czech National Bank, a foreign central bank or the European Central Bank and
 - the World Bank, the International Monetary Fund, the European Investment Bank or
 - another international financial institution.-
- Legal entities fulfilling two of the following three criteria pursuant to last financial statements ("**Balance Sheet Critical Professional Client**"):
- a total balance sheet equal to or greater than 20 million EUR
 - a net annual turnover of a minimum of 40 million EUR
 - a minimum equity of 2 million EUR

or foreign entity established for purpose of business that meets the balance sheet criteria stated in the above paragraph.

(B) Professional Clients upon Request.:

A person may ask WUIB, in general or in relation to specific derivative contracts and/or investment services, to be treated as professional client provided that it satisfies at least two of the following three criteria:

- having realised at least ten significant transactions in average with the investment instrument that the request relates to on the relevant sector of the financial market in the course of each of four consecutive quarters;
- having a minimum portfolio of 500,000 EUR in money and investment instruments;
- for a period of at least one year has exercised, in connection with his employment, occupation or function an activity in the field of the financial market, which requires the knowledge of trades or services that the request relates to.

WUIB may agree with the request if it makes sure that the client meets the above criteria and has the necessary experience and knowledge with investment instruments and investment services to which the request relates to, that such client is capable of making his own investment decisions and understands the related risks.

Becoming a Professional Client upon Request means a lower level of protection. You should take into consideration that such change may mean the loss of the claim to a compensation from a foreign guarantee system similar to the

Guarantee Fund of Investment Firms, and fulfillment of conduct of business rules (set in Sec. 15 to 15r of the Czech Capital Markets Act) in limited scope towards You.

If you are a Professional Client you must communicate to WUIB changes that could influence your classification. Notwithstanding that, if you are a Professional Client upon Request WUIB shall continuously assess whether you satisfy the conditions necessary to be treated as professional client. If we become aware that you do not satisfy the conditions we shall adopt the requisite measures towards changing your categorisation. Professional clients are subject to the following limitations of protection:

1) Duty to provide information

The duty of WUIB to provide information is less thorough for 'professional clients' than it is for 'non-professional clients'.

2) Verification of the appropriateness and suitability of the service provided

With regard either to the suitability check or the appropriateness check, WUIB may presume that, with respect to the, transactions and services for which said client is classified as a professional client has the necessary level of experience and awareness.

3) Foreign guarantee scheme

Professional clients also needn't have a claim to compensations from foreign compensation systems for investors similar to the Guarantee Fund of Investment Firms in the Czech Republic.

4) Financial background

It is also presumed that professional client have in relation to investment advisory a sufficient financial background for undertaking connected investment risks corresponding to his investment targets.

Other limitations of protection relate, among others, to the content of communication with client, the confirmation of transactions and account statements.

Eligible counterparties

We may regard Status professional client as an Eligible counterparty. In such case We are not obliged to follow the conduct of business rules (set in Sec. 15 to 15r of the Czech Capital Markets Act) towards the client.

A Balance sheet professional client and Professional client upon Request may request to be treated as an Eligible counterparty in written form. The request is subject to Our approval.

When you request to upgrade your classification, we may reject such request because, for example, we deem that you deserve the highest level of protection.

You may request a higher level of protection through downgrade of the classification assigned to you (for detail see the Terms and Conditions). In Your request you have to specify in relation to which products, transactions and/or investment Services the treatment shall apply

In particular:

- A Professional client upon Request may request in writing to be treated as non-professional client. We will approve this request.
- A Status professional clients (including an Eligible counterparty) and Balance Sheet professional clients may request to be treated as non-professional clients. Such request is subject to Our approval. In order to be classified as non-professional client, You must conclude a written agreement with Us providing in relation to products, transactions and/or investment Services the treatment as retail client shall apply.
- An Eligible counterparty may again become a professional client by sending Us a written request stipulating in relation to which products, transactions and/or investment Services You want to be so treated. We will approve this request.

Furthermore, on our initiative, we may: (i) treat you as a professional client or as a non-professional client notwithstanding that you could be classified as Eligible counterparty; and (ii) treat you as a non-professional client notwithstanding you could be classified as professional client.

9. Who do we act for when providing financial services?

WUIB is a product issuer, so we are acting on our own behalf. The standards of providing our services to our clients as well as in protecting them are derived from the Austrian Securities Supervision Act 2007 (Wertpapieraufsichtsgesetz 2007), the Czech Capital Market Act (Act No. 256/2004 Coll., Capital Markets Act, as amended) and related regulations.

10. How are we remunerated for the financial services which we provide to you?

Foreign exchange rates – Margins

We obtain revenue through a 'margin'. The margin is the difference between the wholesale exchange rate we are able to obtain and the exchange rate we then offer to the client. The exchange rate we offer to you is dependent on a number of factors including: the value of the transaction and the currency involved, the frequency that you trade with us, the likelihood of increases or decreases in the relevant rates of exchange and the differing interest rates applicable to the currency pair involved in the forward exchange transaction or Option Contract. Please find more information on the calculation of the margins in the Product Disclosure Statement.

The exchange rates quoted in the media generally reflect the wholesale rates on the foreign exchange interbank market. Please note, however, that wholesale exchange rates are constantly changing, and any such rates are generally only obtained by trading significant values.

If you request us to cancel a transaction before settlement, it is very likely that the relevant exchange rate for that transaction will have changed. If that occurs, you will be required to make an additional payment which will reflect the change in exchange rates. We will notify you of any amounts you will be required to pay at the time you request to cancel the transaction.

Example:

You wish to buy EUR 100,000 to pay to your supplier. You wish to pay CZK for this EUR purchase.

- Rate quoted to you for this transaction is EUR/CZK 25.0100. Therefore the CZK converted amount is CZK 2,501,000. This is the amount of CZK you would have to pay to buy the EUR 100,000 to remit to your supplier.
- WUIB will cover the above EUR 100,000 transaction in the money market. For this example, the rate is 25.0000 which equates to CZK 2,500,000. This is the CZK amount that WUIB will have to pay to another institution to buy the EUR 100,000 to cover this transaction on a back to back basis.
- In this example the 'margin' is represented by the difference in the two exchange rates, 0.0100 or CZK 1,000. This amount is the gross revenue earned on this transaction by WUIB.

Note: The rates are illustrative only. You can request further information about the margin by contacting us.

Option Contracts – Premiums

Certain Options Contracts may require payment of an up front, non-refundable premium. WUIB will notify you of the costs of such premiums before entering into a transaction. Further detail can be found in our Product Disclosure Statement (PDS) for Foreign Exchange Option products.

International funds transfers – Transaction fee

If you use the international funds transfers offered by us, transaction fees will apply. Those transaction fees will vary depending on the amount and type of foreign currency transferred, the number and frequency of transfers you conduct through us and the country to which the funds are destined. The transaction fee ranges from EUR 0 to EUR 30 per transfer. Further information is provided in our PDS and the Fee Schedule.

Financial product advice and structuring the solutions – no additional fees

We do not charge you additional fees for providing financial product advice or structuring a financial product according to your needs. We are remunerated for providing those services only by you executing your transaction with WUIB.

There is a possibility that additional costs or charges might occur from transactions in connection with financial instruments or investment services which are not paid through or charged by WUIB. These costs have to be added to the fees paid by you.

11. Is WUIB a member of a deposit guarantee and investor compensation scheme?

As an Austrian bank providing also investment services, WUIB is member of the Austrian deposit guarantee and investor compensation scheme "Einlagensicherung der Banken & Bankiers Gesellschaft m. b. H" with the address Börsegasse 11, 1010 Wien (<http://www.einlagensicherung.at/>). Deposits and other receivables of our customers against us as a credit institution are subject to the protection provided by this deposit guarantee scheme. Further, money owed to or belonging to our customers and held by WUIB on their behalf in connection with investment services are subject to the protection provided by this investor compensation scheme.

12. How do we prevent Conflicts of Interest when providing transactions to you?

WUIB conducts its business according to the principle that it must manage conflicts of interest fairly, both between itself and its clients, between its employees and its clients and between one client and another. Our policy is to take all reasonable steps to maintain and operate effective organisational and administrative arrangements to identify and manage relevant conflicts. The senior management of WUIB is responsible for ensuring that our systems, controls and procedures are adequate to identify and manage Conflicts of Interest. Our Compliance and Legal Departments assist in the identification and monitoring of actual and potential Conflicts of Interest. WUIB has in place business-specific procedures that address the identification and management of actual and potential Conflicts of Interest that may arise in the course of the conducting business.

Considering the business activities related to the product portfolio of WUIB, Conflicts of Interest may arise in situations that include:

- trading on own account;
- provision of advisory services to clients;
- personal account dealing of our employees.

Should a Conflict of Interest arise, it must be managed promptly and fairly. As a minimum standard WUIB has in place arrangements designed to ensure that:

- there are effective procedures in place to control the flow of information where, otherwise, the risk of a Conflict of Interest may harm the interests of a client;
- supervisory arrangements provide for separate supervision of staff where necessary for the fair treatment of the clients;
- there are appropriate controls in place to identify and to manage outside business interests of WUIB employees and management;
- relevant information is recorded promptly in a secure environment to enable identification and management of Conflict of Interest – the Conflicts of Interests Register;
- appropriate disclosure is made to the client in a clear, fair and not misleading manner to enable the client to make an informed decision;

- appropriate inter- and intra-divisional escalation processes are in place and complied with where a Conflict of Interest has been identified or may be identified;
- adequate records are maintained of the services and activities of WUIB, where a Conflict of Interest has been identified;
- where necessary, WUIB employees or managers may be asked to step aside from working on a specific transaction or participating in the management of a potential Conflict of Interest;
- where necessary, WUIB employees or managers are subject to personal account transaction rules; and
- a periodic review of adequacy of the WUIB's systems and controls in order to manage conflict of interest is in place.

In exceptional circumstances if some Conflict of Interest remains and, where permissible by local regulations, WUIB disclose it to affected clients. Disclosure is made of the general nature and/or sources of conflict to enable the client to make an informed decision, whereby the bank secrecy as well as personal data protection requirements are taken into account. In such a case we may resign any evaluation, advice or recommendation concerning the relevant financial instrument. At the client's request we will provide further details for the resolution of any such conflicts of interest on a durable medium.

Inducements

In a very limited number of cases WUIB has entered into agreements with third party referral partners pursuant to which WUIB would pay fees or commissions in relation to the provision of services to our clients.

If WUIB enters into such an arrangement with a third party, the following notifications will be made to the client:

- Prior to the provision of the first investment service, the amount of the corresponding inducement, or if not known, the method to calculate it;
- After the provision of the investment service, the precise amount of the inducement paid or received; and
- At least annually, the total amount of inducements paid or received.

Employee remuneration

Our employees do not receive specific payments or commissions for providing you with financial product advice. Our employees may broadly be divided into two specific categories: branch staff and sales representatives. The Branch staff includes directors, managers, administration personnel. The Branch staff is remunerated primarily by base salary. We also provide a company bonus and revenue sharing plan to branch staff, which is payable when predetermined budget targets are achieved for each branch.

Our sales representatives are also remunerated primarily by a base salary. Individual sales representatives may also be paid bonuses based on a percentage of revenue gained from customers or the number of new accounts which they acquire.

13. Additional information related to communication media and data protection

Links

WUIB does not monitor the content and lawfulness of external websites linked to from its own website. WUIB does not have any influence on the content and design of these websites and expressly dissociates itself from their content, especially if this content is unlawful. Moreover, WUIB does not accept any responsibility for their content and cannot be held liable for such content.

E-mails

We inform you that any e-mails sent to us will only be opened during normal business hours.

Data protection

All personal data will be processed by us in accordance with applicable law including the Czech Data Protection Act (Act No.101/2000 Coll., on Personal Data Protection, as amended), respectively Regulation (EU) 2016/679 - General Data Protection Regulation (GDPR) once it becomes applicable.

14. What should you do if you have a complaint?

Our primary goal is to provide superior client service. To achieve this goal we would like to hear from you if you are dissatisfied with our client service or any of the financial services provided to you.

We have established procedures and policies to ensure that any complaint you may have is properly considered and appropriate measures are taken. If you have a complaint, please contact us by e-mail (see section 15 below). Alternatively you send your complaint in written to our Czech Branch Office Address or to our fax number +420 222 211 054 to the attention of Compliance Officer. Your complaint will be handled in accordance with our Complaints Handling Policy.

15. Key Information and Contact Data

Western Union International Bank, GmbH

Schubertring 11, 1010 Vienna

Tel: +43 (0) 1 506 14-710

Fax: +43 (0) 1 506 17-990

E-mail: WUBSaustria@westernunion.com

Website: <http://business.westernunion.at/>

Western Union International Bank, GmbH, organizační složka:

Václavské náměstí 62, 110 00 Praha 1

Tel: +420 800 10 20 30 or +420 251 001 113

Fax: +420 222 211 054

E-mail: kontakt@westernunion.com

Website: <http://cz.business.westernunion.com/>

Office hours (08:00 CET till 17:00 CET)

Information about the company

Registered office at Schubertring 11, 1010, Vienna

Registering Court: Commercial Court Vienna

Managing Directors: Peter Bucher; Christian Hamberger; Sandra Simundza-Bilandzic

Chairman of the Supervisory Board: Wolfgang Fenkart-Fröschl

Company Register Number: FN 256184 t

Commercial Court of Vienna, DVR: 2111221

Registered by the Czech National Bank as a branch of a foreign bank

Czech Company ID no.: 015 55 332

Registered in the Czech Commercial Register maintained by the Municipal Court in Prague: Section A, Insert 76112

Responsible supervisory authority

Austrian Financial Market Authority

A-1090 Vienna, Otto-Wagner-Platz 5

<http://www.fma.gv.at>

or in regards to providing payments services under Part 4 of the Czech Act No. 370/2017 Coll., on payment services, as amended, and conduct of business rules provided for § 15 et. seq. of the Czech Act No. 256/2004 Coll., Capital Markets Act, as amended, and other regulatory issues supervised by the Czech National Bank pursuant to Czech regulation:

Česká národní banka

Na Příkopě 28

115 03 Praha 1

Telephone: +420 224 411 111

Website: www.cnb.cz