

Report on Investment Services

1. Purpose of the report

The purpose of this report is to gather information about the financial assets acquired on behalf and for the account of the clients of the credit institution.

2. Scope of the report

2.1. The report covers:

2.1.1 balances of the securities and other financial assets of the clients, relating to the following services:

- 1) securities portfolio management as defined for the purposes of clause 43 (1) 4) of the Securities Market Act;
- 2) provision of investment advice as defined for the purposes of clause 43 (1) 5) of the Securities Market Act if it involves securities portfolio management for the client in such a way that the client instructs or approves each transaction;
- 3) safekeeping of securities as defined for the purposes of clause 44 1) of the Securities Market Act;

2.1.2. financial assets acquired on behalf and for the account of clients and held by the reporting credit institution, with regard to which the institution does not provide the services specified in section 2.1.1.

2.1. The report does not cover:

2.2.1. maintaining the register of units in the way described in section 121 of the Investment Funds Act;

2.2.2. balances of clients' assets which have been acquired by clients themselves through various trading platforms and which are not held in safekeeping. The reporting credit institution may have information about such assets in its capacity as the executor of transaction orders given by the client;

2.2.3. balances of securities placed in securities accounts opened in the client's name in the Estonian Central Securities Depository, with regard to which the reporting credit institution does not provide the services specified in subsections 1 and 2 of section 2.1.1;

2.2.4. derivatives held in safekeeping.

3. Data aggregation principles

The balance, quantity and par value of instruments with identical identifiers is aggregated in one row.

4. Structure of the report row

- 1) country code of the client
- 2) client
- 3) other financial institution
- 4) custodian
- 5) instrument type
- 6) special condition
- 7) country code of the instrument

- 8) service type
- 9) instrument location
- 10) instrument balance
- 11) quantity of the securities
- 12) aggregate par value of the securities
- 13) ISIN code
- 14) the country where the service is provided

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1) Country code of the client

The country code is based on the client's residency. In case it is impossible to identify the customer's residency, the code is XX.

2) Client identifier

Central government	1
Local government	2
State social security fund	13
Central bank	12
Credit institution	6
Other deposit-taking corporation	15
Money market fund	16
Insurance company	17
Pension fund	18
Other investment fund	19
Other financial institution	20
Non-financial company owned by the state or local government	7
Other non-financial company	8
Household	10
Non-profit institution serving households	9

3) Other financial institution identifier

Estonian investment firm	1
Estonian fund manager	2
Estonian investment fund	3

Other financial institutions are identified by 1 "Estonian investment firm" if the client is an investment firm operating under an Estonian licence, 2 "Estonian fund manager" if the client is a fund manager operating under an Estonian licence or 3 "Estonian investment fund" if the financial assets form part of an investment fund managed by a fund manager operating under an Estonian licence.

For other clients, including the fund managers and investment firms providing cross-border services in Estonia, identifier 0 (zero) is used.

4) Custodian identifier

Custodian	1
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This field specifies for clients identified as "credit institution" or "other financial institution" whether the institution is a custodian. For other client types and for these credit institutions and other financial institutions which are not custodians, identifier 0 (zero) is used. For instruments which are not securities, identifier 0 (zero) is used.

5) Instrument type identifier

Share and unit	1
Debt security	11
Derivative	3
Deposit	5
Investment fund unit	7
Other	8

This field specifies the client's instrument which is managed by the reporting credit institution or which the reporting credit institution has contractually assigned under someone else's management, including the securities that the client has lent or sold by repurchase agreement.

6) Special condition identifiers

Repo	1
Loan	6
No special condition	4

Identifier 1 is used for the client securities sold by repurchase agreements and identifier 6 for the securities lent. In case neither of these special conditions is applicable or the instruments involved are of a different type, identifier 4 "no special condition" is used.

7) Country code of the instrument

This field specifies the country code determined by the residency of the issuer/counterparty of the instrument.

For securities the country code is determined by the residency of the issuer of the security, for other instruments, by the residency of the counterparty with whom the reporting credit institution has entered into the transaction on behalf of the client.

If the residency of the issuer/counterparty cannot be determined, the country code of the instrument may be based on ISIN-code or, in cases where an ISIN code is not available, on the country where the instrument is being held. In cases where the residency of the issuer/counterparty cannot be determined, code XX is used.

8) Service type identifiers

Securities portfolio management	4
Securities portfolio management with safekeeping of securities	5
Securities portfolio management with investment advice	6
Securities portfolio management with investment advice and safekeeping of securities	7
Safekeeping of securities	3
Other	8

This field specifies the services of the reporting credit institution with regard to the instrument shown in the report row. Identifier 4 "securities portfolio management" is used if the credit institution provides only the service referred to in clause 43 (1) 4) of the Securities Market Act". Identifier 5 "securities portfolio management with safekeeping of securities" is used if the client's securities are in portfolio management as well as in safekeeping. Identifier 6 "securities portfolio management with investment advice" is used for the instruments acquired as a result of the provision of the service described in subsection 2 of

section 2.1.1. Identifier 7 “securities portfolio management with safekeeping of securities” is used if portfolio management services with investment advice as well as safekeeping services are provided with regard to client securities. In case the securities shown in the report row are only held in safekeeping, identifier 3 “safekeeping of securities” is used. If other types of service are provided, which include the safekeeping of the acquired instrument (except securities), identifier 8 “other” is used.

9) Instrument location identifiers

Credit institution's securities account	3
Credit institution's nominee account	4
Client's securities account	5
Other	6

Instrument location identifier is shown only for securities held in an account opened in the Estonian Central Securities Depository. For securities held in the securities account or the nominee account of the reporting credit institution, identifier 3 “credit institution’s securities account” or 4 “credit institution's nominee account” is used. For securities held in the client’s securities account, identifier 5 “client’s securities account” is used. For derivatives, identifier 6 “other” is used.

If the security is not held in the Estonian Central Securities Depository or the instrument shown in the report row is not a security as defined in the Securities Market Act, identifier 0 (zero) is used.

10) Instrument balance

This field specifies the aggregate monetary value of the instruments shown in the report row. Instrument balance is reported at market value (dirty price) or at fair value as of the end of the reporting period. In case of securities whose market value or fair value cannot be determined, the balance is indicated at nominal value or, if this is not available, at acquisition cost. For fund units the balance is reported at net asset value (NAV). For derivatives only positive values are reported. Deposit balance is recorded at contractual value with accrued interest. The balance is reported in euros, rounded to two decimal places.

11) Quantity of the securities

This field specifies the quantity of the securities shown in the report row if the security has an ISIN code and its price is expressed in monetary value.

In other cases – i.e if the instrument is not a security, the security has no ISIN code or its price is not expressed in monetary value – 0 (zero) is indicated for quantity.

The quantity is expressed in pcs, rounded to full values.

12) Aggregate par value

This field specifies the aggregate par value of the securities shown in the report row if the security has an ISIN code and its price is expressed as a percentage of value at par.

The aggregate par value is reported in the original currency, rounded to two decimals.

In other cases – i.e if the instrument is not a security, the security has no ISIN code or its price is not expressed as a percentage of value at par – 0 (zero) is indicated.

13) ISIN code

This field specifies the ISIN code of the security. If the security has no ISIN code, XX is used. XX is used also for the following types of instrument: “derivative”, “deposit” and “other”.

14) Identifier for the country where the service is provided

Estonia	EE
Latvia	LV
Lithuania	LT
Other	XX

This field specifies the country of location of the unit (head office or branch) through which the reporting institution provided the relevant service.

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