

CODE OF CONDUCT

Customers purchasing financial products and services in Belgium are protected by the Markets in Financial Instruments Directive (**MiFID**). The MiFID lays down a code of conduct and organisational requirements that must be respected when providing investment services, with the objective of offering maximum protection to investors.

The Belgian legislator partially integrated this directive into insurance legislation, known as Twin Peaks II, Act of 30 July 2013, supplemented by three Royal Decrees of 21st February 2014. The FSMA Circular of 16th April 2014 supplements this legislation and clarifies it. This Circular entered into force on 30th April 2014. Hence, some elements of the code of conduct and certain organisational requirements also apply to insurance companies and intermediaries.

These new obligations are considered by the FSMA as provisions of general interest, this extension is relevant for Belgian and foreign insurance companies and insurance intermediaries doing business in Belgium.

PRODUCTS AND SERVICES OFFERED

The BDB group (**Group**) place insurance on a wholesale basis. The companies of the Group provide intermediaries with access to certain insurance markets, particularly Lloyd Insurance Company S.A. which is not available to insurance intermediaries in their own territory.

The companies of the Group do not provide any advice on the merits of buying a particular insurance policy, and whether it is suitable for a particular policyholder.

DUTY OF CARE AND NEEDS

The companies of the Group do not deal directly with customers. It is the role of the producing intermediary to deal directly with policyholders and assess their insurance requirements (demands and needs) accordingly. This means that intermediaries analyse customers' needs and requests in order to propose the most suitable product. The intermediaries instruct the companies of the Group to provide insurance quotations.



INSURANCE CLASSES

	Branch of Business	Description
1	Accident	Fixed pecuniary benefits;
1a	Non-industrial accidents;	benefits in the nature of
		indemnity; combinations of
		both; passengers.
1b	Industrial accidents	
2	Sickness	Fixed pecuniary benefits; benefits in the nature of
		indemnity; combinations of
		both; permanent health
		insurance.
3	Land vehicles	Except railway rolling
		stock: all damage to
		motorised and non-
		motorised vehicles.
4	Railway rolling stock	All damage.
5	Aircraft	
5	Alleran	All damage.
6	Ships	All damage to inland
	•	navigation vessels; lake
		navigation vessels; marine
		vessels.
7	Goods in transit	Including merchandise,
		baggage and all other
		goods: all damage to
		goods or baggage in
		transit, irrespective of the
8	Fire and natural forces	form of transport. All damage to property
		(with the exception of
		property included in
		classes 3, 4, 5, 6 and 7)
		when caused by fire;
		explosion; storm; natural
		forces, with the exception
		of hail and frost; nuclear
		energy or subsidence.



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9	Other damage to goods	All damage to property
		(with the exception of
		property included in
		classes 3, 4, 5, 6 and 7)
		when caused by hail or
		frost, including all events
		not already covered under
		8, such as theft.
10	Motor vehicle liability	Any liability resulting from
		the use of motor vehicles.
	Compulsory motor	
10a	vehicle liability insurance;	
10b	Carrier liability insurance;	
11	Aircraft liability	All liability resulting from
		the use of aircraft
		(including carrier's liability).
12	Liability of ships	All liability resulting from
		the use of marine and
		inland navigation vessels
		(including carrier's liability).
13	General liability	All other forms of liability
		not already covered under
		nos. 10, 11 and 12.
14	Credit	General insolvency; export
		credit; instalment credit;
		mortgages; agricultural
		credit.
15	Suretyship/Bonds	Direct suretyship; indirect
		suretyship.
16	Miscellaneous financial	Unemployment risks;
	loss	insufficiency of income
		(general); bad weather;
		loss of profit; continuing
		general expenses;
		unforeseen trading
		expenses; loss of market
		value; loss of rent or
		revenue; indirect trading
		losses other than those
		mentioned above; other
		financial loss (non-trading);



		other forms of financial
		loss.
17	Legal expenses	
18	Emergency Assistance	Assistance to persons who
		get into difficulties while
		travelling, while away from
		home or while away from
		their permanent residence;
		assistance under other
		circumstances.

REMUNERATION

The companies of the Group, in return of their activities, receive a commission payment from insurers which is part of the premium charged to the customers, the amount is calculated as a percentage of the insurance premium. Upon request we will provide information regarding any commission which we may have received as a result of placing insurance business.