

Banque Transatlantique Luxembourg

Products, services and pricing
conditions applicable from 1st of
January 2020

BANQUE TRANSATLANTIQUE
LUXEMBOURG



BANQUE TRANSATLANTIQUE LUXEMBOURG

Banque Transatlantique Luxembourg is your partner in full-service wealth management, offering expertise from its teams in Luxembourg, as well as the group as a whole and its partners. We have created an extensive, robust offering of investment solutions, we have tailored our loan and credit products to assist you with cash management, and we are here to help you manage your assets and achieve your personal and professional objectives.

1- Account agreement (“maintaining the account” for the purposes of the Grand-Ducal Regulation of 6 June 2018)

When you choose Banque Transatlantique Luxembourg as your wealth management partner, you sign an account agreement with us that provides the framework for a relationship of trust between us.

The account maintenance fees, which are set on an annual basis for private and corporate clients, include the following:

- A multicurrency current account;
- Access to a credit card for account holders or representatives (a Gold card for private clients and a Business card for corporate clients);
- An asset-backed credit facility in the form of a conventional line of credit for clients with eligible financial assets worth over one (1) million euros deposited with the bank (subject to signing a specific agreement);
- A quarterly portfolio statement, including a detailed picture of your investment portfolio with transparent disclosure of all securities trades carried out over the previous quarter, plus the fees incurred;
- Access to internet services.

The following fees are debited every six months in arrears:

	Annual amount	Six-monthly charge
Private clients	€11.025	€512,5
Corporate clients (+ applicable VAT rate)	€1,230	€615

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2- Our investment services

Banque Transatlantique Luxembourg can help you manage your assets. Whether you would like to delegate management of your assets, take advice from our experts while retaining control of your asset management, or manage your portfolio independently, we can offer you a range of investment services tailored to your assets and expectations:

- If you would like to **delegate management** of your portfolio to the bank's experts, Banque Transatlantique Luxembourg has created two investment services tailored to both your investor profile and your investment capacity - Profiled Discretionary Management and Customised Discretionary Management if you have investment capacity of over three (3) million euros;
- If you would like to **retain control** of managing your assets **while accessing our expertise**, we can offer two separate investment advice options: Investment Solution Account and Advisory Management if your assets are worth more than one (1) million euros;
- If you would like to **make your own investment decisions independently** and benefit from the bank's ability to access the financial markets, we can offer you our Execution Account.

Banque Transatlantique Luxembourg has opted for Non-Independent Advisor status.

	Below €250,000	€250,000 - €1 million	€1 million - €3 million	€3 million - €10 million	Above €10 million
Discretionary	Profiled Discretionary Management	Profiled Discretionary Management	Profiled Discretionary Management	Profiled Discretionary Management/Customised Discretionary Management	Customised Discretionary Management
Advisory		Investment Solution Account	Investment Solution Account/Advisory Management	Investment Solution Account/Advisory Management	Investment Solution Account/Advisory Management
Independent	Execution Account				

Whatever degree of delegation you opt for, we can tailor your investment strategy to your **investor profile**, which we will establish with you as soon as we begin working together.

We offer **four investment strategies**:

- **Defensive:** You are seeking performance above that of money market returns while benefiting from a high level of protection for your capital;
- **Balanced:** Your profile is characterised by a balance between risk and return. You are simultaneously seeking a regular income and growth in your portfolio;
- **Dynamic:** Your strategy consists of seeking strong growth potential over the long term;
- **Aggressive:** You wish to prioritise capital growth for your portfolio.

Our investment services are based on a rigorous selection process designed in close cooperation with Banque Transatlantique Group's teams.

- A strategic allocation committee to establish the investment policy: selecting investment themes and drawing up investment scenarios, defining the asset allocation structure and deciding on market exposure;
- A tactical allocation committee to work out tactical scenarios and select stocks: tactical adjustments to exposure, sector weightings and stock picking.

Backed by the research undertaken by our own teams and the experts at Banque Transatlantique Group, we have selected and maintain an extensive universe of open architecture investment opportunities that includes a wide range of financial instruments.

The asset management teams, backed by tools and platforms that can be accessed at the bank, and by a network of carefully selected partners, ensure that for orders transmitted, the execution of trades takes place under the best possible conditions.

For all these services, you will need to sign a contract with Banque Transatlantique Luxembourg:

- A discretionary management agreement for our Profiled Discretionary Management and Customised Discretionary Management services;
- For advisory services, an Investment Solutions Account agreement or an Advisory Management agreement;
- An agreement enabling you to place orders with the bank through an Execution Account.

2.1. Discretionary Management – Delegating management of your portfolio

Profiled Discretionary Management

If you would like your asset portfolio to be managed by the bank, our dedicated team will manage your assets through the ***Profiled Discretionary Management*** service by:

- Taking account of your goals, your appetite for risk, your investment horizon and your investment knowledge;
- Using information networks and our research to offer you rigorous and consistent management, adapted to financial market changes, with the aim of achieving the best possible performance while meeting your risk management requirements. We also provide a quarterly asset management letter containing clear, pertinent information which is up-to-date in terms of our teams' analysis and the investment decisions within the framework of the different investment strategies.
- Continuously analysing your portfolio, while keeping control of risk, in order to take tactical decisions that we consider to be appropriate as markets change;
- Providing you with a quarterly portfolio statement giving a detailed picture of your portfolio and transactions, as well as a detailed description of the fees applied;
- At your request, one of our asset management experts can work with your advisor.

Customised Discretionary Management

For clients with an investment capacity of over three (3) million euros who are seeking a greater degree of sophistication and personalisation for their portfolio, we can offer ***Customised Discretionary Management***.

With this option, you will have access to the same services as Profiled Discretionary Management, as well as:

- Customised asset allocation, reflecting your goals and taking account of your projects, your investment horizon, your appetite for risk and your investment experience;
- Potentially, a greater proportion of your assets invested in direct lines, requiring more active management;
- An asset management expert who can apply the investment strategy that matches your investor profile while taking account of your specific requirements and investment preferences (currency, market, business sector, etc.);
- More contact with your advisor who can also work with an asset manager.

2.2 Advisory – Maintaining control of your investment decisions while accessing our expertise

For those who would like to manage their asset portfolio in conjunction with the bank's experts, we have created a comprehensive service to help with investment decisions, and we can adapt the degree of interaction with our investment advisors to match expectations and requirements.

Investment Solution Account

If you would specifically like to have access to an investment advisor who can answer your questions and share their market expertise with you if required, we have created the ***Investment Solution Account*** which provides the following:

- Fast and effective access to your advisor who can answer your questions about investments and provide advice;
- Depending on market patterns, guidance on funds and structured products (on an open architecture basis) selected by the Bank;
- Detailed analysis of the asset allocation structure, based on the structure of the models created by our asset management department;
- Continuous monitoring of the value of your portfolio (you will be contacted if the portfolio loses 10% or more of its value);
- Our quarterly asset management letter, providing information on financial markets and a portfolio statement providing an in-depth picture of your assets held with us, as well as information on transactions over the previous period, fees per transaction, and your portfolio's level of risk.

Advisory Management

If you would like Banque Transatlantique Luxembourg to continuously monitor your portfolio and asset allocation, then proactively contact you to inform you of investment opportunities that could optimise that allocation, we can provide the following:

- An interactive relationship with one of our investment advisors who will proactively research the market, make investment proposals, and answer your questions;
- Suggestions for investments and asset switching for different types of financial instrument (European and international shares, bonds, investment funds, and structured products) based on asset allocation analysis for your portfolio in line with your investor profile, in order to maximise performance while respecting your appetite for risk;
- Regular monitoring of your portfolio to ensure that the suggested investment opportunities are in line with your investment profile, to check your portfolio's level of risk (risk budget, asset allocation, and gap analysis) and to inform you if there are significant changes in the value of your portfolio (you will be contacted if the portfolio loses 10% or more of its value);
- Access to market information and frequent references to the various relevant investment strategies via your investment advisor;
- Our quarterly asset management letter, providing information on financial markets and a portfolio statement providing an in-depth picture of your assets, as well as information on transactions over the previous period, transaction fees, and your portfolio's level of risk.

2.3. Execution Account – Making your own investment decisions

If you would prefer to make your investment decisions independently, and would like Banque Transatlantique Luxembourg to simply execute your orders to buy and sell securities, we can offer you our **Execution Account**. The list of tradable financial instruments is contained in the factsheet on financial instruments available on our website.

2.4. Pricing applicable to our investment services

Please note that our pricing for these services breaks down as follows:

- Management/advisory fees;
- Trading fees (buying or selling) which are based on the type of financial instrument and currency involved;
- Custody fees.

In relation to our Investment Solution Account, Advisory Management and Execution Account products, the fees received from collective investment vehicles or their representatives may be retained by the Bank in accordance with the conditions imposed by regulations.

Management/advisory fees are applied to our Profiled Discretionary Management, Customised Discretionary Management, Investment Solution Account and Advisory Management services.

They are calculated based on the capital under discretionary management or subject to an advisory agreement, and they cover the following services:

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- Regular analysis of your assets and investment opportunities,
- Access to an advisor who knows you and understands your situation,
- Regular portfolio statements.

The fee rates depend on the type of investment service provided and are given on a quarterly basis in the table below:

Management/advisory fees (+ applicable VAT rate)	<€1 million	€1-3 million	€3-10 million	>€10 million
Profiled Discretionary Management ¹	0.3%	0.25%	0.15%	0.075%
Customised Discretionary Management			0.1%	0.075%
Investment Solution Account ²	0.15%	0.125%	0.1%	0.075%
Advisory Management ³	0.3%	0.25%	0.2%	0.15%

Management fees are debited each quarter and are calculated based on the last valuation of your portfolio at the end of the previous quarter.

¹ Minimum amount: 307.5 €

² Minimum amount : 153.75 €

³ Minimum amount : 307.5 €

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Our **brokerage fees** cover the cost of executing your various orders and are calculated based on the value of your order, and on the type of underlying security.

Brokerage fees (i)	
Brokerage fees, shares (ii)	0.80%
Brokerage fees, shares, Euronext Paris Deferred Settlement Service (iii)	1.65%
Brokerage fees, bonds (iv)	0.30%
Entry fees, structured products (v)	1.5%
Transaction fees for other complex products (vi)	1.5%
Corporate Actions	0.25%

- (i) In the case of Discretionary Management (Profiled Discretionary Management or Customised Discretionary Management), brokerage fees are subject to the applicable VAT rate. Brokerage fees in the case of Advisory services (Investment Solution Account and Advisory Management) are exempt from VAT;
- (ii) For direct equity lines and equity funds – purchases and redemptions (minimum: €41). For investment funds, promoter entry fees are payable in addition;
Correspondent bank fees are included except for US stock market transactions, to which are added settlement fees of USD18 and London Stock Exchange purchases, to which are added stamp duty of 0.5%;
- (iii) Maximum rate, minimum amount €307.50;
- (iv) For direct bond lines and bond funds – purchases and redemptions - minimum €41. For investment funds, promoter entry fees are payable in addition;
- (v) Excluding the structuring fees charged by our partners;
- (vi) As defined by MiFID (Markets in Financial Instruments Directive).

Custody fees cover the safekeeping and monitoring of your portfolio (shares, bonds, including investment funds, and precious metals). The rate of custody fees depends on the value of the assets placed in the bank's custody, as outlined in the table below (quarterly rate).

Value of portfolio's assets	<€1 million	€1-3 million	€3-10 million	>€10 million
Quarterly custody fees Minimum: €307.50 per quarter + applicable VAT rate	0.1%	0.075%	0.05%	0.025%

The custody fees are calculated at the end of each quarter on a pro rata temporis basis.

For the Profiled and Discretionary Management options, a **performance fee** is payable in addition to the management fee for the Balanced, Dynamic, Defensive and Aggressive profiles. It is calculated annually based on the last valuation of your Profiled Discretionary Management portfolio (the day before the last business day of the year), as follows:

Profile	Threshold	Performance fee
Defensive	Euribor 3 months	15% of the annual performance above the stated threshold per profile (+ applicable VAT rate)
Balanced	3%	
Dynamic	5%	
Aggressive	7%	

This fee does not apply to accounts opened after 30 June in the relevant year or to accounts closed before 30 June of the relevant year.

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For clients who would like to manage their financial assets independently through an **Execution Account**, the pricing conditions below apply:

Execution Account	
Quarterly custody fees Minimum €512.50 (+ applicable VAT rate)	0.2%
Brokerage fees, shares (i)	2%
Brokerage fees, bonds (ii)	1%
Entry fees, structured products (iii)	1.5%
Transaction fees for other complex products (iv)	1.5%
Corporate actions	0.25%

- (i) For direct equity lines and equity funds – purchases and redemptions (minimum: € 256.25). For investment funds, promoter entry fees are payable in addition;
Correspondent bank fees are included except for US stock market transactions, to which are added settlement fees of USD18 and London Stock Exchange purchases, to which are added stamp duty of 0.5%;
- (ii) For direct bond lines and bond funds – purchases and redemptions - minimum € 256.25. For investment funds, promoter entry fees are payable in addition;
- (iii) Excluding the structuring fees charged by our partners;
- (iv) As defined by MiFID (Markets in Financial Instruments Directive).

3- Long-standing experience in life insurance

Banque Transatlantique Luxembourg is a broker authorised by the Insurance Commission and meets all the requirements to sell life insurance in Luxembourg.

We offer an open architecture service that will enable you to find solutions tailored to your expectations, based on your country of residence.

We work with an extensive network of partners on the Luxembourg market with whom we have built trust-based relationships over a period of many years, to the benefit of our mutual clients.

The pricing is based on the pricing applied by the insurance company via the broker (please contact your advisor for details). The management and brokerage fees are those applicable to Discretionary Management.

4- Asset Engineering and Tax Assistance

In consultation with the experts at your disposal (financiers, lawyers, and tax specialists) and a strong network of dedicated international professionals, our Asset and Financial Engineering teams can help you with all the banking aspects of your asset strategy.

We can assist you in organising your accounts held at the bank so that they are aligned with the structure of your portfolio, and can act as a link between your advisers in the various countries in which you operate, and factor in the international aspects of your situation.

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As part of our Advisory Management service, the Engineering teams can also, in some jurisdictions, provide you with an analysis of the potential tax impact of transactions that you are contemplating.

Banque Transatlantique Luxembourg is able to assist you with tax formalities (tax returns and payment of local taxes, and steps taken to obtain a reduced tax rate) for the income generated by your portfolio.

We also provide our clients with an annual tax report to help with the completion of tax returns, which takes account of local regulations and legal specificities. This service is currently available for Luxembourg, France, Belgium, Spain, the UK and Germany.

Tax Assistance	
	10% of the recovered tax (minimum amount of €1.025) (+ applicable VAT)

5- Financing your projects and lombard loans (asset management assistance)

As financing is an essential component in managing your overall asset portfolio, we would like to assist you in this respect, taking into account your family situation, your personal and family-owned assets, and your various personal and professional goals in the short, medium and longer term.

Banque Transatlantique Luxembourg can help you make your projects a reality and optimise your cash management by offering you various types of loans and credit.

- Contractual loan;
- Lombard loans;
- Property loans;
- The provision of guarantees.

Contractual loan

Clients with a weighted asset portfolio worth over four (4) million euros held at the bank and managed under a Discretionary or Advisory Management agreement, whether diversified or single-line, may access a contractual loan. This credit line has a limit of one (1) million euros (**). Above that amount, the client has to make an application to the Banque Transatlantique Luxembourg Credit Committee.

This credit line will be automatically managed by the bank.

Contractual loan	
Interest rate (*)	12-month Euribor +0.8%
Interest rate calculation method	360/360
Administrative fees	No charge

(**)The limit takes account of the overall commitments recorded in the client's accounts and those of any legal entity held as to more than 25%, either directly or indirectly, by the client.

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Lombard Loans

If you would like to optimise the management of your assets and take advantage of market opportunities, you may take out a lombard loan under the following conditions:

Lombard Loans	
Interest rate(*)	12-month Euribor +1.2%
Interest rate calculation method	360/360
Administrative fees	0.25% of the authorised loan (minimum € 1,000)

Property loans

Property forms a significant part of most of our clients' assets, whether it is a principal or secondary residence, or an investment property. Banque Transatlantique Luxembourg can offer expertise and experience with mortgage loans in the UK, France, Luxembourg, Portugal and Spain.

A fact sheet covering all types of property loan is available on request from your advisor.

Property loans	
Please contact your advisor for information about the interest rate(*) applicable to any type of property loan	
Administrative fees (for each loan arranged)	1% of the borrowed capital (minimum €1.000)
Amendment fees	€1.000

(*) *In all cases, Banque Transatlantique Luxembourg now includes a reference to "refinancing cost" in its loan pricing, corresponding to the spreads on refinancing arrangements. This cost will be a maximum of 0.30% in € and 0.50% in foreign currencies and, for variable-rate loans, it will take the following form: index+refinancing rate+margin.*

A minimum rate of 0 is automatically applied to indices that cannot be negative.

Provision of guarantees

We can assist our clients with their personal and business projects by providing guarantees:

- First demand guarantees;
- Liability guarantees;
- Rent guarantees.

Provision of guarantees

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Guarantees less than or equal to €1,000,000	1.5% of the guarantee provided (minimum: €2.500)
Guarantees above €1,000,000	0.5% of the guarantee provided

6- Cash management

Banque Transatlantique Luxembourg can help you with cash management:

- Contractual line of credit
- Arranged overdrafts⁴ – personal loans
- Foreign exchange spot transactions
- Foreign exchange forward transactions
- Sight deposit and term deposit accounts

Contractual line of credit

As part of the account agreement entered into with the bank, and if you hold assets with us of a value of at least one (1) million euros, we can in principle grant you an advance on dividends and/or unrealised capital gains equivalent to 10% of your assets held with us, capped at one (1) million euros(**).

<i>Contractual line of credit</i>	
Interest rate (for loans in euros)	3-month Euribor+2%
Interest rate calculation method	360/360 days
Administrative fees	No charge

*(**) The limit takes account of the overall commitments recorded in the client's accounts and those of any legal entity held as to more than 25%, either directly or indirectly, by the client.*

⁴ As defined by the Grand-Ducal Regulation of 6 June 2018

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Arranged overdrafts⁵ – personal loans

Banque Transatlantique Luxembourg's private and corporate clients have the option of taking out an overdraft.

Risk fees	
Overdraft fees <i>Rate applied to the difference between the account's highest debit balance each month over the period, and the authorised balance</i>	2.5%
Extended overdraft fees <i>Rate applied to the average negative balance for the period, if the account is in debit for over 51 consecutive or non-consecutive days during the quarter (17 days on a monthly basis)</i>	0.6%

Current account	
Interest rate for account in debit, authorised overdraft	3-month Euribor + margin (contact us for more information)
Interest rate for account in debit, unauthorised overdraft	12%
Interest rate for account in credit	0%
Interest rate calculation method	360/360 days

Companies	
Debit transaction fees	0.15% – quarterly
Fee on the highest overdrawn amount in the quarter	0.20%

Foreign exchange spot transactions

We can facilitate management of your foreign currency assets and execute foreign exchange spot transactions for you in the main currencies, namely GBP, US and Canadian dollars, the yen, the Swiss franc, and the Norwegian krone as per the terms given below.

Forex spot transactions	
Exchange value of less than €25,000	1%
Exchange value of €25,000 - €50,000	0.75%
Exchange value of €50,000 - €100,000	0.50%
Exchange value of over €100,000	0.25%

Foreign exchange spot transactions are carried out at the forex interbank market rate. This rate is increased or decreased by a margin that varies according to fees that may be charged by other intermediaries involved.

For other currencies, please contact your advisor.

⁵ As defined by the Grand-Ducal Regulation of 6 June 2018

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Note that for market transactions initiated in one currency and settled in another, a forex spot transaction is automatically undertaken by the Bank. In this situation, a forex margin will be automatically applied to the forex interbank market exchange rate, and this margin will depend on the amount of the transaction (see above table).

Foreign exchange forward transactions

We can also help you with foreign exchange forward transactions, with the aim of hedging the currency risk for your foreign currency assets.

Contact your advisor for information about the relevant fees.

Sight deposit and term deposit accounts

The following pricing conditions apply to sight deposit accounts over € 100,000 and after merging all the balances of the same client.

Sight deposit accounts	
Contribution to cost of negative rates	0.50% of the balance calculated on the basis of an end-of-month average

Term deposit accounts offer euromarket deposit rates (EURIBID or LIBID) minus a variable margin based on the currency, amount and term. The minimum amount required to open a term deposit account is €50,000. Penalties may be applied for early repayment (check with your advisor for details).

Pricing conditions applicable to all financing, loan and overdraft activities:

Pricing conditions for all financing, loan and overdraft activities (excluding fees charged by intermediaries)	
Re-issuing amortisation table	€123
Interest certificate	€75.88
Fee for non-payment in excess of 8 days	€153.75
Fee for reminder letter	€153.75
Reminder about overdrawn current account	€153.75
Risk-related arrangements (after 60 days)	€512.5
Charge for initiating litigation	€1537.5
Attachment of account	€307.50
Mortgage release certificate	€1.025
Mortgage renewal	€1.025
Annual guarantee letter	€123

Cost related to search closed or dormant accounts - minimum
1% of sums

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7- Other banking products and services

7.1. Day-to-day account services

In addition to the high value-added services that we provide via our investment services, financing products and other products, which enable you to optimise your cash management, Banque Transatlantique Luxembourg can help you with more traditional banking operations.

Banknotes – value dates		
Cash deposits in banknotes	Euro	Business day
	EEA (European Economic Area) currencies	Business day
	Other currencies or if foreign exchange transactions (or disagio applied, depending on the currency)	Business day
Cash withdrawals ⁶ in banknotes: let us know 48 hours before withdrawing a large sum	Euro	Business day
	EEA (European Economic Area) currencies	Business day
	Other currencies or if foreign exchange transactions	Business day
Provision of funds	1% of the amount provided	

Cheques	
Depositing a cheque	Subject to Collection: cheque-depositing fee of 0.30% (minimum €20,5 + correspondent bank fees)
	Credit after cheque deposit: Subject to Collection +€102,5
Issuing a bank draft	Eurozone: 1% (minimum of €102,5 per cheque + postal charges)
	Other currencies: 1% (minimum of €102,5 per cheque + postal charges)
Returning a bounced cheque	€102,5 + correspondent bank fees

Depositing a cheque outside Europe 0.50%, Europe fixed charge of €30 + correspondent bank fees

Sending money⁷ - bank transfers	
Bank transfer received	Credited with net amount received on correspondent bank's value date. On business day if transfer in one of the EEA's 15 currencies. +2 business days if conversion involving other currencies
Authorising a standard bank transfer or a transfer via SWIFT to another country	Eurozone: 0.20% (minimum €30,75, maximum €1,000)
	Other countries: 0.20% (minimum €46,13, maximum €3,000)
	Value date: on business day if transfer in one of the 15 EEA currencies, otherwise business day -1
Transfer of securities	€307,5 per line +0,1% of the portfolio value

Gold and precious metals

⁸ As defined by the Grand-Ducal Regulation of 6 June 2018

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⁶ As defined by the Grand-Ducal Regulation of 6 June 2018

2% of the amount of the transaction – a minimum of €76.88 + broker's fees and any shipping costs.
Physical delivery 1%.

7.2. Credit card management (“providing a credit card” for the purposes of the Grand-Ducal Regulation of 6 June 2018)

The account agreement between private/corporate clients and Banque Transatlantique Luxembourg includes a payment card.

Credit card-related fees (excluding intermediary fees)	
Altering monthly payment limit	€50
Authorisation to exceed monthly limit	€50
Re-issuing PIN	€30
Duplicate proof of card payment	€50
Issuing a replacement credit card	€50
Credit card blocking for improper use	€100

Annual fee for credit card in EUR, GBP, USD and CHF

- Amount charged in the currency of the card.

In urgent situations, the following fees apply:

Emergency re-issuing of a replacement card	€100
Emergency issuing of PIN	€100

7.3. Other services

Miscellaneous (+ applicable VAT rate)	
Inheritance – administrative processing of bank account file	€1 537.5 excluding external legal fees and estate research
Issuing a certificate (account balance – ownership)	€102.5
Blocking certificate	€512.5
Photocopying costs	€1.025 (per page)
Archival research	€153.75 per hour
Account closure fees (exempt from VAT)	€512.5
Administrative/change of administrator fees	€102.5
Fees for LEI request (annual) *	€205
Re-printing account statements ⁸	€153.75 per hour

(*) in abstracto from additional costs invoiced by the provider

⁹ As defined by the Grand-Ducal Regulation of 6 June 2018