

ASSURMIFID: CODE OF CONDUCT

The primary objective of the European directive 'MiFID' (Markets in Financial Instruments Directive) is an enhanced consumer protection in respect of financial products and services.

This European directive provides for a number of rules of conduct applicable to financial service providers.

These rules of conduct are aimed to achieve a better transparency of these products and services for the consumer.

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.

As independent insurance brokers, the assured is our main concern. Havrico Insurance have always aimed to duly advise and inform its clients in a clear and correct way. We search for and negotiate tailor made insurance solutions, that meet the needs of our clients and at competitive terms and conditions. We always act with integrity and in all transparency.

Please find hereunder some details in respect of our company and the procedures that we have established in conformity with Belgian Law, in order to comply with the requirements of the MiFID rules.

1. Havrico Insurance is a limited company according to Belgian Law with head office at 2000 Antwerp, Godefriduskaai 26. The company is registered under company number 453.894.870.

Our company is officially registered with the FSMA (Financial Services Market Authority) under number 21.215A. The FSMA is domiciled at 1000 Brussels, Congresstraat 12-14. The register of insurance intermediaries can be consulted on www.fsma.be.

2. You can communicate with us, in Dutch, French or English, in writing (letter, fax) or through electronic correspondence (e-mail, skype, sms, etc.), but also by phone, via our website or through a personal meeting.

Our contact details:

- Godefriduskaai 26, B – 2000 Antwerpen
- Phone n°: +32 (0)3 / 281.48.78
- Fax n°: +32 (0)3 / 230.39.03
- E-mail: insurance@havrico.be
- Website: www.havrico.be

3. Complaints

We do everything necessary to ensure your satisfaction. In case of problems or questions, we are at your disposal. If you have a complaint with regard to our services and we have not been able to solve it jointly, we kindly ask you to contact our compliance officer, Mrs Ellen Vrints (ellen.vrints@havrico.be). In the last resort you may contact the department of the 'Insurance Ombudsman', which is located at following address:

Square Meeûs, 35
1000 Bruxelles
Tel: +32 (0)2 / 547.58.71
Fax: +32 (0)2 / 547.59.75
Email: info@ombudsman.as
www.ombudsman.as

4. Services offered and authorised activities

In our capacity of insurance broker, we offer advice and insurance solutions. Based on the identification and analysis of the risks of our clients, we develop insurance contracts and place these in all independence with insurance companies on our market or on foreign insurance markets. We also take care of the complete management of these policies.

We are mainly specialised in marine and transport insurance, such as cargo insurance and liability insurance of carriers, charterers and forwarders.

As member of the BVVM / UPCA, we follow the rules and principles that have been accepted by our professional federation at a sectorial level. These can be consulted on <http://www.bvvm.be/fr/assurmifid>.

We can also assist you in other insurance branches, in conformity with our registration with the FSMA.

The general conditions of the insurance products, offered by Havrico Insurance, are available on demand.

5. Management of conflicts of interest

As member of the BVVM / UPCA, we follow the rules and principles that have been accepted by our professional federation at a sectorial level. These can be consulted on <http://www.bvvm.be/fr/assurmifid>.

6. Remuneration

As member of the BVVM / UPCA, we follow the rules and principles that have been accepted by our professional federation at a sectorial level. These can be consulted on <http://www.bvvm.be/fr/assurmifid>.