



## COMMERCIAL INITIATIVE

**Invest in ETF Savings Plan.**

**Get 3% on your Savings during 6 months.**

**VALID FROM NOVEMBER 2025 TO MARCH 2026**

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### **Intesa Sanpaolo Wealth Management S.A.**

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**Intesa Sanpaolo Wealth Management - Belgium Branch** Succursale de/Succursaal van Intesa Sanpaolo Wealth Management S.A. (Luxembourg)

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## 1. COMMERCIAL INITIATIVE

Intesa Sanpaolo Wealth Management and Intesa Sanpaolo Wealth Management, Belgium Branch (hereinafter referred to as the “**Bank**”) present the following commercial initiative in relation to the Bank’s online banking services and investment services platform Fideuram Direct (the “**Platform**” or “**Fideuram Direct**”), dated December 2025, called:

**“Invest in ETF Savings Plan.  
Get 3% on your Savings Account.”**

(hereinafter also referred to as the “**Initiative**”), which will be conducted in accordance with the terms and conditions set forth in this document and the general terms and conditions and special conditions of the Bank applicable to the Platform (the “**General Terms and Conditions**”), as available in the Platform and on the Bank’s websites promoting the platform [www.fideuramdirect.lu](http://www.fideuramdirect.lu) and [www.fideuramdirect.be](http://www.fideuramdirect.be).

Terms used in capital letters in this Initiative shall have the meanings assigned to them in the General Terms and Conditions, unless otherwise specifically defined in this document.

## 2. VALIDITY PERIOD OF THE INITIATIVE

The Initiative will run as from 07:00 a.m. on 1/11/2025 until 07:00 p.m. on 31/03/2026 (hereinafter the “**Validity Period of the Initiative**”), under the terms defined in this document.

## 3. INITIATIVE DESCRIPTION AND DURATION

The Initiative offers the possibility to earn a gross annual credit interest rate of 3% (three percent) (the “**Promotional Interest Rate**”) on amounts deposited into the Savings Account, for a duration of 6 (six) months, starting as of the opening date of any ETF Savings Plan by a client during the Validity Period of the Initiative and under the specific terms and conditions detailed in sections 4 and 5 below.

The ETF Savings Plan service consists of clients instructing the Bank to execute a recurrent, periodic order to purchase a specific ETF in accordance with the Special Conditions for ETF Savings Plan (the “**Special Conditions for ETF Savings Plan**”), as available on the Platform and on the Bank’s above-mentioned websites.

The clients who intend to open an ETF Savings Plan are invited to carefully read and review the Special Conditions for ETF Savings Plan and the General Information Document.

**Investing in ETFs carries risks, such as market fluctuations, which can lead to losses. Sector-specific ETFs may lack diversification, increasing vulnerability to economic changes. Additionally, tracking errors can cause the performance of the ETF to deviate from its underlying index, potentially reducing returns. More information can be found in section 5 of the General Information Document (Overview of the main characteristics and risks of financial instruments) available in the Bank’s website above-mentioned and in the Platform.**

The ETF Savings Plan service is limited to the execution of orders and the reception and transmission of orders at the sole initiative of the client. This service does not include any advisory services by the Bank and it is specified that this service does not include the provision of investment advice. Any ETFs under the ETF Savings Plan are selected by the client in total autonomy without being subject to any personalized recommendations, nor any prior suitability or appropriateness assessment by the Bank in any capacity.

Before subscribing to an ETF Savings Plan, we recommend ensuring that this type of investment is suitable for your investor profile and financial objectives.

The Promotional Interest Rate applies exclusively to funds deposited in the Savings Account and is independent of the performance of any investment product.

Please note that the Promotional Interest Rate is significantly higher than the standard Basic Interest Rate generally applicable in your Saving Account but it is directly linked to your investment in an ETF Savings Plan.

**The Promotional Interest Rate will only be granted if you subscribe to the ETF Saving Plan during the Validity Period of the Initiative.**

The Basic Interest Rate generally applicable on the Savings Account shall continue to apply to any non-eligible amounts or after the expiry of the promotional period.

#### 4. **CONDITIONS OF ELIGIBILITY**

The Initiative is open to all natural persons, of legal age, residents in Luxembourg or Belgium – except US persons or politically exposed persons (PEPs) – and who meet the following conditions (the “**Eligible Clients**”):

- Have an opened, active and functioning account with Fideuram Direct;
- Have subscribed to at least one ETF Savings Plan (with weekly, bi-weekly and monthly Periodic Orders) within the Validity Period of the Initiative as further detailed in section 5 below.

The Initiative may not be combined with any other ongoing promotional initiatives addressed to clients holding accounts with Fideuram Direct.

#### 5. **TERMS OF PARTICIPATION AND EXECUTION OF THE INITIATIVE**

**The participation in the Initiative shall be subject to the following additional and specific conditions:**

- The Eligible Clients must subscribe to an ETF Savings Plan (at least one) with monthly, weekly or bi-weekly Periodic Orders of at least EUR 100 (one hundred euros) during the Validity Period of the Initiative. It is understood that ETF Savings Plans with quarterly Periodic Orders and/or ETFs Savings Plan subscribed before or after the Validity Period of the Initiative are excluded from the Initiative;
- The Promotional Interest Rate shall only apply to amounts deposited into the Savings Accounts up to a maximum of EUR 40,000 (forty thousand euros). Any portion of amount exceeding this threshold will be subject to the Basic Interest Rate;
- The Initiative is valid for a duration of 6 (six) calendar months starting from the First Investment Date (made during the Validity Period of the Initiative) at a rate of 3% (three percent). At the end of the six (6)-month promotional period, the applicable interest rate will automatically revert to the Basic Interest Rate in effect at that time.
- The Promotional Interest Rate shall be calculated on an annual basis and accrued monthly on the Savings Account. The interest amount accrued for the preceding month shall be credited to the Savings Account within the first few days after the closing of the month. The calculation of the Promotional Interest Rate shall commence on the First Investment Date;
- If the Eligible Clients fail to execute at least one Periodic Order under an ETF Savings Plan during any given one-month period, the Promotional Interest Rate shall cease to apply from that month onwards. In such case, the Eligible Clients shall continue to benefit from the Basic Interest Rate starting from the month in which no Periodic Order under the ETF Savings Plan was executed.

#### 6. **DISCLAIMER OF LIABILITY**

The Eligible Clients acknowledge that the application of the Promotional Interest Rate is subject to the terms and conditions set forth in this document.

The Promotional Interest Rate shall automatically apply to Eligible Clients. Should the Eligible Clients wish not to benefit from the Initiative, they shall contact Fideuram Direct Client Support at [support@fideuramdirect.be](mailto:support@fideuramdirect.be) or [support@fideuramdirect.lu](mailto:support@fideuramdirect.lu).

This Initiative is entirely optional and shall not affect the client's ability to open or maintain an ETF Savings Plan or a Savings Account.

The Bank reserves the right to modify, suspend or withdraw this Initiative, even partially and at any time, in compliance with applicable laws and regulations.

Any modifications to the conditions of the Initiative made during its term may be communicated to the Eligible Clients through the communication channels agreed upon in accordance with the General Terms and Conditions.

The Bank shall not be held liable for any consequences arising from a participant's ineligibility or failure to meet the specified criteria.

This Initiative does not constitute investment advice or a recommendation to subscribe to any financial instrument. ETF Savings Plans are investment products that involve market risks, including the potential loss of capital (see also section 3 above). They are not covered by any deposit guarantee scheme.

## 7. PROCESSING OF PERSONAL DATA

For any further information regarding the processing of personal data, reference is made to the General Terms and Conditions, the Cookie Policy and Privacy Notice as made available in the Fideuram Direct platform and websites as referred below (see "Legal Documentation" section).

Personal data are processed for the purpose of carrying out the Initiative, in accordance with the data protection legislation, and in particular with the General Data Protection Regulation (EU) 2016/679.

## 8. EXCLUSION FROM THE INITIATIVE

The Bank reserves the right, at its sole discretion, to exclude any participant from the Initiative for any specific reason, including, without limitation, anti-money laundering, regulatory or compliance-related grounds.

The Bank also reserves the right to conduct any and all checks necessary to verify the participation's conditions to benefit from the Initiative and may invalidate or suspend participation in the event of fraudulent behaviour or any breach of the proper conduct of the Initiative. In such cases, the Bank reserves the right to take any appropriate measures, in accordance with applicable law, to limit or prevent any attempt to circumvent the systems, rules, or mechanics of the Initiative.

## 9. FINAL NOTES

For further information, please consult the related documentation available on the websites [www.fideuramdirect.lu](http://www.fideuramdirect.lu) and [www.fideuramdirect.be](http://www.fideuramdirect.be).