CUSTOMER INFORMATION (FinSA / FinSO)

Switzerland has adopted the Federal Act on Financial Services (FinSA) and its implementing ordinance (FinSO). They entered into force on January 1, 2020.

This legislation aims to improve investor protection.

Swiss Finance Management International SA, (hereinafter: "the Asset Manager") is subject to this law insofar as it carries out asset management and investment advisory services.

This brochure reflects the situation as of 16.02.2023. Should this document change, the latest version will be made available to the Asset Manager's customers.

1. General information requirements for financial service provider

1.1 General information on the Asset Manager

Name:	Swiss Finance Management International SA
Address:	1-3 Rue Maurice, Geneva, 1204, Switzerland
Phone:	+41 22 707 0261

The Asset Manager essentially carries out the following activities:

- Asset management for private and professional clients;
- Investment advisory services for private and professional clients.

Swiss Finance Management International SA holds a license as an asset manager pursuant to Article 17 of the Financial Institutions Act (FinIA). The license is granted by the Swiss Financial Market Supervisory Authority FINMA.

The Asset Manager is supervised by the supervisory organization:

Name:	OSIF - Organisme de Surveillance des Instituts Financiers
Address:	Rue de Rive 8, 1211 Genève 3, Switzerland
Phone:	+41 22 580 39 39
E-Mail:	welcome@osif.ch

1.2 Confidentiality

The Company is required to observe professional confidentiality in its business relationship with the Client and to treat as confidential all specific data, information and documents on the Client received in the course of the business relationship. This obligation shall continue after termination of the contractual relationship.

1.3 Dormant assets

Occasionally, contacts with clients are broken off and assets subsequently become dormant. Such assets can be permanently forgotten by the clients and their heirs. The following is recommended to avoid loss of contact or dormant assets:

- **Change of address and name:** Immediate notification of any change of residence, address or name
- **Special instructions:** Information about longer absences and of any redirection of correspondence to a third-party address as well as of how the client can be reached in urgent cases during this time
- **Granting of powers of attorney:** An authorized person can be designated whom the asset manager can approach in the event of an interruption of contact
- **Orientation of trusted persons and testamentary disposition:** Another possibility to avoid lack of contact and news is to inform a trusted person about the relationship with the asset manager. However, the asset manager may only provide information to such a trusted person if he or she has been authorized to do so in writing. Furthermore, the assets concerned may be mentioned, for example, in a testamentary disposition

1.4 Mediation Body

Financial service providers such as the Company must be affiliated to an ombudsman's office. Disputes regarding legal claims between the client and the financial service provider should be settled by an ombudsman in mediation proceedings if possible, which does not exclude legal proceedings. The mediation process is fair, expeditious, impartial and inexpensive for the client, if not free of charge.

The Company is affiliated with the following ombudsman's office:

Name:	Terraxis SA
Address:	Rue de la tour de l'Ile 1, 1204 Genève, Switzerland
Phone:	+41 22 732 61 19

2. Financial services offered by the Asset Manager

2.1 Asset Management

2.1.1 In general

In asset management, the asset manager manages, in the name, for the account and at the risk of the client, assets which the client has deposited with a custodian bank. The asset manager carries out transactions at his own discretion and without consulting the client.

In doing so, the asset manager ensures that the transaction he executes corresponds to the client's financial circumstances and investment objectives as well as to the investment objectives agreed with the client and ensures that the structuring of the portfolio is suitable for the client.

The asset manager selects the investments within the framework of the considered market offer to be included in the portfolio with due care. The asset manager shall ensure an appropriate distribution of risk to the extent permitted by the investment strategy. He shall regularly monitor the assets under his management and ensure that the investments are in line with the investment strategy agreed on, in the investment profile and are suitable for the client.

The asset manager shall regularly inform the client about the asset management agreed on and provided to the client.

2.1.2 Risks

Asset management basically involves the following risks, which are in the client's sphere of risk and are therefore borne by the client:

- **Risk of the selected investment strategy:** Various risks may arise from the investment strategy selected and agreed by the client. The client bears these risks in full. An overview of the risks and a corresponding risk explanation are provided before the investment strategy is agreed on.
- **Asset preservation risk or the risk that the financial instruments in the portfolio depreciate:** This risk, which can vary depending on the financial instrument, is borne in full by the client. For the risks of the individual financial instruments, please refer to the brochure "Risks Involved in Trading Financial Instruments" of the Swiss Bankers Association.
- **Information risk on the part of the asset manager** or the risk that the asset manager has too little information to be able to make an informed investment decision: When managing assets, the asset manager considers the client's financial circumstances and investment objectives (suitability test). If the client provides the asset manager with insufficient or inaccurate information about his financial circumstances and/or investment objectives, there is a risk that the asset manager will not be able to make investment decisions that are suitable for the client.
- **Risk as a qualified investor in collective investment schemes:** Clients who make use of asset management services within the framework of a long-term asset management relationship are deemed to be qualified investors within the meaning of the Collective Investment Schemes Act. Qualified investors have access to certain types of collective investment schemes which are exclusively open to them. This status allows a broader range of financial instruments to be considered in the design of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are therefore not or only partially subject to Swiss regulations. This may give rise to risks, particularly regarding liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key information document and the prospectus.

Furthermore, risks arise during asset management which lie within the risk sphere of the asset manager and for which the asset manager is liable vis-à-vis the client. The asset manager has taken suitable measures to counter these risks, in particular by observing the principle of good faith and the principle of equal treatment when processing client orders. As far as it is within the asset manager's sphere of influence, he shall ensure the best possible execution of client orders.

2.2 Investment advisory services

2.2.1 In general

In providing comprehensive investment advice, the Company advises the client on transactions in financial instruments, considering the portfolio. To this end, the Company ensures that the recommended transaction corresponds to the financial circumstances and investment objectives (suitability test) as well as the needs of the client or the investment strategy agreed with the client. The client then decides for himself to what extent he wishes to follow the recommendation of the Company SFM.

In the case of comprehensive advice, the client has the right to receive personal investment recommendations that are suitable for him. Comprehensive investment advice is provided at the initiative of the client or the Company in relation to financial instruments available within the scope of the market offer considered. In doing so, the Company shall advise the client to the best of its knowledge and belief and with the same diligence that it uses in its own affairs.

The Company regularly checks whether the structuring of the portfolio for comprehensive investment advice corresponds to the agreed investment strategy. If it is found that there is a deviation from the agreed percentage structuring, SFM the Company will recommend a corrective measure to the client.

The Company shall draw up an advisory record for each advisory meeting. The client may at any time request that a record of one or more specific advisory meetings be provided.

2.2.2 Risks

In addition to the risks mentioned above in the context of asset management, there are, in principle, additional risks in the case of an advisory mandate which arise within the client's risk sphere and are therefore borne by the client:

- **Risk regarding timing when placing orders** or the risk that following an advice, the client places a buy or sell order too late, which can lead to price losses: The recommendations made by the asset manager are based on the market data available at the time of the advice and are only valid for a short period of time due to the market dependency.
- **Risk as a qualified investor in collective investment schemes**: Clients who make use of asset management services within the framework of a long-term asset management relationship and/or comprehensive investment advice within the framework of a long-term investment advisory relationship are deemed to be qualified investors within the meaning of the Collective Investment Schemes Qualified investors have access to specific types of collective investment schemes that are exclusively open to them. This status enables a broader range of financial instruments to be considered in the design of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are therefore not or only partially subject to Swiss regulations. This may give rise to risks, particularly regarding liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key information document and the prospectus.

Furthermore, comprehensive investment advice gives rise to risks which are in the sphere of risk of the Company and for which the Company is liable vis-à-vis the client. SFM the Company has taken appropriate measures to counter these risks, in particular by observing the principle of good faith and the principle of equal treatment when processing client orders. Furthermore, the Company ensures the best possible execution of client orders.

2.3 Market offers considered

The market offers considered in the selection of financial instruments covers third party financial instruments but also financial products (in particular AMC) for which the Company assumes specific tasks (advisory, management or any other function related to the said investment vehicle.

2.4 Risks with financial instruments

For information on the risks generally associated with financial instruments, please refer to the brochure "*Risks Involved in Trading Financial Instruments*" published by the Swiss Bankers Association. The brochure is available on the Internet under the online link :
«SBA_Risks_Involved_in_Trading_Financial_Instruments_2019_EN.pdf (swissbanking.ch)».

3 Dealing with Conflicts of Interest

3.1 In general

Conflicts of interest may arise when the Asset Manager has an interest in the outcome of a financial service provided to clients that is contrary to that of the clients.

Possible causes of conflicts of interest are namely:

- Financial incentives for the asset manager to carry out certain investment decisions, e.g. compensation from third parties
- The use of the asset manager's own products or those of third parties economically linked to him
- The coincidence of several client orders
- The coincidence of client orders with the asset manager's own transactions or those of his employees.

In order to identify conflicts of interest and prevent them from having a negative effect on the client, the asset manager has issued internal guidelines and taken organizational precautions:

- The Asset Manager has established an independent control function that continuously monitors the investments and transactions of the Asset Manager's employees as well as compliance with market conduct rules.
- When executing orders, the Asset Manager respects the principle of priority, i.e. all orders are immediately recorded in the chronological order of their receipt.
- The Asset Manager must request from his employees to disclose mandates that may lead to a conflict of interest.
- The Asset Manager must plan his remuneration policy in such a way as not to create incentives for behaviour violating his contractual duties.
- The Asset Manager regularly trains his employees and ensures that they have the necessary knowledge.

Within the scope of the services provided to the client, the Company has identified a conflict of interest and informs its clients in a transparent manner:

- Remuneration received from third parties (see ch. 3.2. below).
- The investment of the Client's assets in AMCs and funds (see 2.3), remunerated in addition to the asset management mandate.

3.2 Compensation by third parties in particular

The Company may accept compensation from third parties (e.g. brokerage fees, commissions, rebates, kickbacks, finder's fees, portfolio management commissions or other pecuniary advantages) that are connected to the provision of its financial services. The Company informs its clients in the mandates in full transparency of the amount received and ensures that their interests are protected in case of conflicts of interest.

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Customer information issued on ______________________