

INVICO

INVICO Asset Management AG – Federal Act on Financial Services (FinSA) Client Information Document

1. Introduction

The purpose of this FinSA Client Information Document is to inform you about how INVICO Asset Management AG (hereinafter "INVICO", "we" or "us") applies certain requirements of the Federal Act on Financial Services ("FinSA") as from the 1 January 2022.

FinSA mainly governs the provision of financial services as well as the offering of financial instruments and is intended to strengthen client protection. In terms of content, FinSA is closely aligned with the European regulatory reforms and mainly covers the following areas:

- Enhancement of client protection
- Transparency of financial products
- Organisational requirements for the provision of financial services.

The introduction of FinSA resulted in increased information and documentation obligations for financial service providers in Switzerland, offering financial services related to financial instruments (e.g. portfolio management, investment advice and the acquisition or disposal of financial instruments). It also extended the organisational measures to be taken by them.

This FinSA Client Information Document provides you with an overview of INVICO's implementation of the FinSA conduct requirements. It supplements any contractual agreement between you and INVICO. In case of any contradictions, the respective contractual agreement will prevail.

2. About INVICO Asset Management AG

INVICO is an authorised asset manager pursuant to the Federal Act on Financial Institutions ("FinIA"). As an asset manager, we are, among others, subject to the rules under FinIA, FinSA and the Federal Act on Collective Investment Schemes ("CISA").

Since 1995, INVICO specialises in managing the assets of private investors and families whose assets are deposited with one or more banks. We offer clients an optimal and individual access to the financial markets at attractive conditions. Companies and institutions that have entrusted their cash and treasury management in professional hands are also our long-standing, loyal clients. Our independence for more than 25 years guarantees the free choice of banks and investment products. The access to first class Swiss and international banks enables INVICO to invest the assets of its clients successfully over generations, tailored to the individual risk profile. In cooperation with external specialists, we offer our clients not only asset management and advisory but also family office services (e.g. estate and tax planning as well as company formations). For decades, our legendary market reports have regularly provided information on current market developments and the effects on investments. INVICO's recommendations and considerations are neutral. As an independent asset manager, we are looking for investment opportunities that match the personal interest and investment profile of our clients.

INVICO is a privately-owned asset manager.

For further information about our services, please contact your client relationship manager or contact us under:

INVICO Asset Management AG

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8001 Zurich
Switzerland
+41 44 267 60 80
info@invico-asset.ch
www.invico-asset.ch

3. Regulatory Information

INVICO is a member of the self-regulatory organisation VQF Verein zur Qualitätssicherung bei Finanzdienstleistungen. Contact details:

VQF Verein zur Qualitätssicherung bei Finanzdienstleistungen

General-Guisan-Strasse 6
6300 Zug
Switzerland
+41 41 763 28 20
info@vqf.ch
www.vqf.ch

Asset managers who are subject to a self-regulatory organisation must be authorised by the Swiss Financial Market Supervisory Authority FINMA ("FINMA") and affiliated to a supervisory organisation by 31 December 2022 at the latest. INVICO is currently in the process of applying to FINMA for authorisation as an asset manager under FinIA. INVICO will join FINcontrol Suisse AG as a supervisory organization. Contact details:

Swiss Financial Market Supervisory Authority FINMA

Laupenstrasse 27
3003 Bern
Switzerland
+41 31 327 91 00
info@finma.ch
www.finma.ch

FINcontrol Suisse AG

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General-Guisan-Strasse 6
6300 Zug
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4. Client Segmentation under the Federal Act on Financial Services (FinSA) and the Federal Act on Collective Investment Schemes (CISA)

Under FinSA, all financial services providers are required to segment their clients into the following three segments: private (retail) clients, professional clients and institutional clients. Each segment is assigned a different level of investor protection (e.g. with regard to information duties, suitability and appropriateness obligations, documentation and accountability duties). If all clients are treated as private clients, a client segmentation is not required. INVICO treats all clients as private clients. All INVICO clients therefore benefit from the highest level of investor protection under the FinSA.

Under the CISA, INVICO's clients are considered investment advisory and/or asset management clients and therefore qualified investors pursuant to art. 10 para. 3ter CISA (Private clients for whom a Swiss financial intermediary pursuant to the Banking Act, the FinIA or the CISA or a foreign financial intermediary subject to equivalent prudential supervision provides asset management or investment advice within the framework of a long-term asset management or investment advisory relationship,

unless the clients have declared that they do not wish to be considered as such. The declaration must be in writing or in another form verifiable by text).

Qualified investors may invest in Swiss collective investment schemes that are subject to a simplified authorisation and approval procedure and are exempt from certain investor protection requirements and/or in foreign collective investment schemes that are not authorised for offering to non-qualified investors in Switzerland and are therefore not subject to supervision by FINMA. Such foreign collective investment schemes may be subject to requirements that are not equivalent to those of the CISA, e.g. with regard to organisation and/or legal structure, investor rights or investment policy/restrictions.

5. Information on the financial services offered by INVICO

INVICO provides its clients with the financial services of asset management, investment advice and the acquisition and sale of financial instruments in accordance with Art. 3 lit. c lit. 1, 3 and 4 FinSA.

5.1. Asset management

5.1.1. Nature, characteristics and functioning of the financial service

The asset manager, as the client's authorised representative, manages the client's assets in the name and for the account and at the risk of the client. Within the framework of the suitability test, the agreed investment strategy and investment restrictions, the asset manager carries out transactions at its own free discretion and without consulting the client.

5.1.2. Rights and duties

The asset manager has a duty to the client to manage the assets in the client's portfolio. In doing so, the asset manager selects the investments to be included in the portfolio with due care. The asset manager ensures an appropriate distribution of risk within the framework of the investment strategy. He regularly monitors the assets under management and ensures that the investments are in line with the agreed investment strategy and are suitable for the client. The asset manager regularly informs the client about the asset management activities.

5.1.3. Risks

The following risks basically arise which lie in the client's sphere of risk and which are therefore borne by the client:

- Risk of the chosen investment strategy: Different risks may arise from the investment strategy chosen by the client and agreed with the asset manager. The client bears these risks in full. A presentation of the risks and a corresponding risk explanation are provided before the investment strategy is agreed.
- Substance preservation risk or the risk that the financial instruments in the portfolio lose value: 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 booklet "Risks in trading with financial instruments" published by the Swiss Bankers Association (SBA).
- Risk as a qualified investor in collective investment schemes: Clients who make use of asset management within the framework of a long-term asset management relationship are considered qualified investors within the meaning of the CISA. They have access to collective investment schemes that are exclusively open to qualified investors. This status enables a broader range of financial instruments to be taken into account in the design of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are thus not or only partially subject to Swiss regulations. This may give rise to risks, in particular due to liquidity, investment strategy or transparency. Detailed information on the risk profile of a particular collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, the basic information sheet and the prospectus.
- Information risk on the part of the asset manager or the risk that the asset manager has too little information to make an informed investment decision: In asset management, the asset manager

takes into account the client's financial circumstances and investment objectives, depending on the client segment (suitability test). Should the client provide the asset manager with insufficient or inaccurate information regarding 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.

Furthermore, asset management gives rise to risks which lie within the asset manager's sphere of risk and for which the asset manager is liable to the client. INVICO 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. INVICO ensures the best possible execution of client orders.

5.1.4. Market offer taken into account

The market offering taken into account in the selection of financial instruments includes INVICO's own financial instruments and those of third parties. The following financial instruments may be used in the context of asset management:

- Shares listed on Swiss and/or foreign stock exchanges;
- Debt securities issued by governments and companies;
- Units in collective investment schemes;
- Derivatives traded on an exchange or over-the-counter ("OTC") with regulated financial intermediaries specialising in these transactions;
- Structured products;
- Money market instruments;
- Bonds (shares in a global loan with uniform terms).

5.2. Portfolio-related investment advice

5.2.1. Nature, characteristics and operation of the financial service

Investment advice is the provision of personal recommendations relating to transactions in financial instruments. Within the framework of portfolio-related investment advice, the investment advisor advises the client on transactions with financial instruments, taking into account the client's entire portfolio. Depending on the client segment, this is done according to the results of the suitability test. The client then decides for herself/himself to what extent he wishes to follow the recommendation of the investment advisor.

5.2.2. Rights and obligations

Depending on the agreement with the client, portfolio-related investment advice may be provided at agreed intervals both at the initiative of the client and at the initiative of the investment advisor. In doing so, the investment adviser shall advise the client to the best of its knowledge and belief and with the same care as it takes in its own affairs.

Depending on the agreement with the client, the investment advisor shall regularly check whether the structuring of the portfolio corresponds to the agreed investment strategy. If it is determined that there is a deviation from the agreed investment strategy, the investment advisor shall recommend a corrective measure to the client.

Furthermore, the investment advisor regularly informs the client about the agreed and provided investment advice.

5.2.3. Risks

In the case of portfolio-related investment advice, the following risks exist in principle, which lie in the client's sphere of risk and which are therefore borne by the client:

- Risk of the selected investment strategy: Different risks may arise from the investment strategy selected by the client and agreed with the investment advisor (cf. below). The client shall bear

these risks in full. A presentation of the risks and a corresponding risk explanation are provided before the investment strategy is agreed.

- Substance preservation risk or the risk that the financial instruments in the portfolio lose value: 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 booklet "Risks in trading with financial instruments" of the SBA.
- Information risk on the part of the client or the risk that the client has too little information to make an informed investment decision: Even if the investment advisor takes the portfolio into account when providing portfolio-related investment advice, the client makes the investment decisions himself. Accordingly, the client needs specialist knowledge to understand the financial instruments. Thus, the risk arises for the client that he does not follow the investment recommendations that are suitable for him due to a lack of or inadequate financial knowledge.
- Risk with regard to timing when placing orders or the risk that the client places a buy or sell order too late following advice, which can lead to price losses: The recommendations made by the investment advisor 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.
- Information risk on the part of the investment advisor or the risk that the investment advisor has too little information to be able to make an appropriate recommendation: In the case of portfolio-related investment advice, the investment advisor takes into account the financial circumstances and investment objectives (suitability test) as well as the needs of the client, depending on the client segment. If the client provides the investment advisor with insufficient or inaccurate information about his financial circumstances, investment objectives or needs, there is a risk that the investment advisor will not be able to provide him with suitable advice.
- Risk of insufficient monitoring or the risk that the client does not monitor his portfolio or monitors it insufficiently: Before making an investment recommendation, the investment advisor reviews the composition of the portfolio. Outside of the advisory service, the investment advisor is not obliged to monitor the structuring of the portfolio at any time. Insufficient monitoring by the client may give rise to various risks, such as cluster risks.
- Risk as a qualified investor in collective investment schemes: Clients who take advantage of portfolio-related investment advice within the framework of a long-term investment advisory relationship are considered qualified investors within the meaning of CISA. Qualified investors have access to forms of collective investment schemes that are exclusively open to qualified investors. This status enables a broader range of financial instruments to be taken into account in the design of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are thus not or only partially subject to Swiss regulations. This may give rise to risks, in particular due to 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 basic information sheet and the prospectus.

Furthermore, portfolio-related investment advice gives rise to risks that are within the risk sphere of the investment adviser and for which the investment adviser is liable to the client. The investment adviser 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. INVICO ensures the best possible execution of client orders.

5.2.4. Market offer taken into account

The market offering taken into account in the selection of financial instruments includes own and third-party financial instruments. Within the scope of portfolio-related investment advice, the following financial instruments are available to the client:

- Shares listed on Swiss and foreign stock exchanges;
- Debt securities issued by governments and companies;
- Units in collective investment schemes;
- Derivatives traded on the stock exchange or OTC with regulated financial intermediaries specialising in these transactions;
- Structured products;
- Money market instruments;
- Bonds (shares in a global loan with uniform terms and conditions).

5.3. Transaction-related investment advice

5.3.1. Nature, characteristics and operation of the financial service

Investment advice is the provision of personal recommendations relating to transactions in financial instruments. In the context of transaction-based investment advice, the investment advisor advises the client on individual transactions in financial instruments without taking into account the client's portfolio. Depending on the client segment, the investment advisor inquires about the knowledge and experience of its clients and, before recommending financial instruments, checks whether these are appropriate for the client (appropriateness test). Based on this, the investment advisor gives the client a personal recommendation for the purchase, sale or holding of financial instruments. The client decides for himself to what extent he wishes to follow the recommendation of the investment advisor. He is responsible for the structuring of his portfolio. The composition of the portfolio and the suitability of a financial instrument for the client (suitability test), i.e. whether a financial instrument corresponds to the investment objectives and financial circumstances of the client, is not checked by the investment advisor.

5.3.2. Rights and duties

The investment advisor gives personal investment recommendations. Depending on the agreement with the client, transaction-related investment advice may be provided at agreed intervals both at the initiative of the client and at the initiative of the investment adviser. In doing so, the Investment Advisor shall advise the Client to the best of its knowledge and belief and with the same diligence that it uses in its own affairs. Furthermore, INVICO regularly informs the client about the investment advice agreed and provided.

5.3.3. Risks

In the case of transaction-related investment advice, the following risks arise in principle, which lie in the sphere of risk of the client and which are therefore borne by the client:

- Substance preservation risk or the risk that the financial instruments in the portfolio lose value: This risk, which may 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 booklet "Risks in Trading with Financial Instruments" published by the SBA.
- Information risk on the part of the investment advisor or the risk that the investment advisor has too little information to be able to make an appropriate recommendation: In transaction-related investment advice, the investment advisor takes into account the knowledge and experience as well as the needs of the client, depending on the client segment. If the client provides the investment adviser with insufficient or inaccurate information about his knowledge, experience and/or needs, there is a risk that the investment adviser will not be able to advise him appropriately.
- Information risk on the part of the client or the risk that the client has too little information to make an informed investment decision: The investment advisor does not take into account the composition of the portfolio when providing transactional investment advice and does not conduct a suitability test with regard to the client's investment objectives and financial circumstances. Accordingly, the client needs specialist knowledge in order to understand the financial instruments. Thus, transaction-based investment advice creates the risk for the client that, due to a lack of or inadequate financial knowledge, he/she will make investment decisions that do not correspond to his/her financial circumstances and/or investment objectives and are therefore not suitable for him/her.
- Risk with regard to timing when placing orders or the risk that the client places a buy or sell order too late following advice, which may lead to price losses: The recommendations made by the investment advisor 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 of insufficient monitoring or the risk that the client does not monitor his portfolio or monitors it insufficiently: The investment advisor does not at any time have a duty to monitor, advise, warn or explain with regard to the quality of the individual positions and/or the structuring of the portfolio. Various risks, such as cluster risks, may be associated with inadequate monitoring by the client.
- Risk as a qualified investor in collective investment schemes: Clients who take advantage of transaction-related investment advice within the framework of a long-term investment advisory relationship are considered qualified investors within the meaning of the CISA. Qualified investors

have access to forms of collective investment schemes that are exclusively open to qualified investors. This status enables a broader range of financial instruments to be taken into account in the design of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are thus not or only partially subject to Swiss regulations. This may give rise to risks, in particular due to 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 basic information sheet and the prospectus.

Furthermore, transaction-related investment advice gives rise to risks which are within the risk sphere of the investment adviser and for which the investment adviser is liable to the client. The investment adviser 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. INVICO ensures the best possible execution of client orders.

5.3.4 Market offer taken into account

The market offering taken into account in the selection of financial instruments includes own and third-party financial instruments. The following financial instruments are available to the client for transaction-related investment advice:

- Shares listed on Swiss and foreign stock exchanges;
- Debt securities issued by governments and companies;
- Units in collective investment schemes;
- Derivatives traded on the stock exchange or OTC with regulated financial intermediaries specialising in these transactions;
- Structured products;
- Money market instruments;
- Bonds (shares in a global loan with uniform terms and conditions).

5.4 Acquisition and disposal of financial instruments

INVICO offers its clients a broadly diversified range of financial instruments. The risks associated with the financial instruments offered, as well as other important information that forms the basis of an investment, can be found in the relevant documents (such as the prospectus, fund contract, key investor information document (KIID) or basic information sheet and annual and semi-annual reports). The current version of the relevant documents can be obtained from the website www.invico-asset.ch (under "Products" or from INVICO).

6. Appropriateness & Suitability

FinSA generally requires financial service providers that provide investment advice or portfolio management services for private clients to perform an appropriateness or suitability review.

INVICO relies on the information provided by you or the individual authorised to act on your behalf. You or your authorised representative(s) are obliged to notify INVICO immediately of any change in circumstances that may necessitate changes or updates in terms of appropriateness or suitability.

For execution only services, which we only offer in exceptional instances, we will neither conduct an appropriateness nor a suitability check. This information about the non-performance of appropriateness or suitability checks in the context of execution only services is only provided here as a one-time information and will not be repeated at a later stage when execution only transactions occur.

7. General risks of financial instruments

Investments in financial instruments involve opportunities but also bear risks. It is important that you understand these risks before using a financial service. For this purpose, the booklet "Risks Involved in

Trading Financial Instruments" of the SBA is made available on our website: www.invico-asset.ch. You can also obtain a copy of the booklet from your client relationship manager on request. Please read this information carefully. If you have any questions, please contact your client relationship manager.

8. Cost Information

Costs and fees may be incurred both by INVICO and by third parties (e.g. through third party financial instruments in your portfolio) in connection with the provision of financial services. We distinguish between costs and fees that are charged directly to your account and indirect costs related to holding of financial instruments (e.g. ongoing charges). INVICO also uses its own financial instruments and/or such financial instruments for which INVICO acts as asset manager or as investment adviser when providing services. In this case, INVICO may receive both remuneration for its activity for the financial instrument and remuneration for its activity as asset manager or investment adviser for other clients. This may result in conflicts of interest. INVICO discloses the amount of the remuneration received to the clients.

Information on the actual costs and fees of your financial services are disclosed in the agreement between INVICO and you and can also be obtained from your client relationship manager.

9. Offered Market Universe

When rendering financial services, INVICO generally offers financial instruments that are issued, managed, developed, administered or controlled by it or use third party financial instruments.

10. Execution of Orders (Best Execution)

When executing client orders, we ensure that the best possible outcome is achieved in terms of cost, timing and quality. We have taken all appropriate steps to obtain the best-possible result when executing transactions in financial instruments for you.

Please contact us, if you have any questions regarding our Best Execution Policy.

11. Conflicts of Interest

INVICO has implemented and maintains appropriate organisational and administrative measures with a view to taking all appropriate steps to prevent or manage conflicts of interest that could arise through the provision of financial services from constituting or giving rise to a risk of damage to the interest of its clients.

A conflict arises where the interests of one party (e.g. INVICO, or a director, or any staff, or a client) are not currently, or may not in future be aligned with the interests of another party. Therefore, one party may be disadvantaged to the advantage of the other.

Our Conflicts of Interest Policy which is proportionate to the nature and scale of our business, allow us to identify, record, manage, mitigate or disclose conflicts of interest. Where disadvantages for clients cannot be ruled out, or only at disproportionate expense, we will disclose this fact to you in a suitable manner.

Please contact us, if you have any questions regarding our Conflicts of Interest Policy.

12. Business Affiliations with Third Parties

INVICO is a privately-owned asset manager. We cooperate with third party providers in Switzerland and abroad in many ways. If INVICO's affiliation with third parties leads to a conflict of interest in the context of providing a financial service to you and such conflict of interest cannot be eliminated or managed/mitigated, we will inform you of this in an appropriate manner.

13. Compensation from Third Parties

As a general principle, INVICO strives to provide its financial services and use its financial instruments in a way to avoid receiving any third-party remuneration (in particular Retrocessions). Should any third-party remuneration still be incurred, INVICO passes on to its clients, periodically and with the appropriate level of accountability, any such remuneration that it receives from third parties in connection with the financial services provided by INVICO.

14. Complaints Management / Mediation Procedure

Ensuring client satisfaction is our priority. We appreciate your feedback and take every comment and complaint seriously. Should you not be happy with our services, we kindly ask you to send us an email at info@invico-asset.ch or contact your client relationship manager. We handle all requests and complaints in line with our regulatory obligations and internal procedures. In order to address your request or complaint efficiently and swiftly, we require your full name and contact details as well as the reason for your request or complaint in as much detail as possible alongside any relevant documents. We will acknowledge the receipt of your request or complaint and will provide you with an answer to your request or complaint as soon as possible. We may request the provision of additional information necessary to confirm your identity when you file a request or complaint. Should our response not be satisfactory to you and should you wish to initiate a mediation, you can contact the

Finanzombudsstelle Schweiz (FINOS) ("FINOS"):

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FINOS is a free and neutral information and mediation agency. In general, FINOS only gets actively involved after INVICO receives and has had an opportunity to respond to a written client complaint.

Disclaimer

This FinSA Client Information Document is provided to you for information and regulatory purposes only and provides an overview of how INVICO applies the statutory conduct obligations.

Although it has been thoroughly checked, INVICO does not accept any liability for the adequacy, accuracy, completeness or correctness of the content of this FinSA Client Information Document.

The FinSA Client Information Document reflects the status as per 1 January 2022 and may be updated by INVICO unilaterally at any time without further notice to clients. You can always obtain the most recent version of the FinSA Client Information Document from your client relationship manager. After the 1 January 2022, the most recent version of the FinSA Client Information Document can be downloaded from our website: www.invico-assets.ch (under "Regulatory Information").

This FinSA Client Information Document does not constitute an offer or solicitation by or on behalf of INVICO to utilise a service, buy or sell financial instruments or participate in a specific trading strategy in any jurisdiction.