

FinSA

Client Information Document

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Introduction

Based on the legal requirements pursuant to Art. 8 et seq. of the Financial Services Act (FinSA), an overview of Helvetica Asset Management AG (hereinafter "the Financial Institution") and its services is given below.

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 mainly covers the following areas:

- Enhancement of client protection;
- Transparency of financial products;
- Organizational 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 organizational measures to be taken by them.

The level of protection to be provided by a financial service provider depends on the respective client classification (explained in more detail in Chapter 4). The client classification determines the scope of the applicable duties of conduct or organizational measures to be applied to the respective client relationship.

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About Helvetica Asset Management AG / Financial Services

The Financial Institution is a fund management company authorized by the Swiss Financial Market Supervisory Authority FINMA ("FINMA") pursuant to the Federal Act on Financial Institutions ("FinIA").

The Financial Institution manages various contractual collective investment schemes under Swiss law and provides the following financial services to professional, institutional and private clients: (i) the acquisition or sale of financial instruments and (ii) the acceptance and transmission of orders involving financial instruments. In the context of pure brokerage services (acquisition and sale of financial instruments and the acceptance and transmission of orders relating to financial instruments), the Financial Institution does not provide personal

recommendations. The Financial Institution does not perform adequacy and suitability tests.

For more information about the services provided by the Financial Institution, please contact the relationship manager or contact us at:

Helvetica Asset Management AG

Brandschenkestrasse 47
CH-8002 Zurich
Switzerland
Telephone: +41 43 544 70 80
E-Mail: office@helvetica.com
Website: www.helvetica.com

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Supervisory Authority

The Financial Institution is authorized by the Swiss Financial Market Supervisory Authority FINMA ("FINMA") and prudentially supervised by it.

Contact details:

Swiss Financial Market Supervisory Authority FINMA

Laupenstrasse 27
CH-3003 Bern
Switzerland
Telephone: +41 31 327 91 00
E-Mail: info@finma.ch
Website: www.finma.ch

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Client Segmentation

4.1

General Information

Under FinSA, all financial service providers are required to allocate their clients into one of 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, documentation and accountability duties).

Before the Financial Institution is allowed to provide financial services, it must establish a client classification for each client within the scope of cooperation.

Subject to certain conditions, the client may change the segmentation by opting in or opting out in writing, which also changes the level of client protection and conduct obligations for the client relationship.

4.2

Institutional Clients**a. Classification as Institutional Client**

Classified as institutional clients are:

- **Per se Institutional Clients** according to Art. 4 para. 4 FinSA:
 - a. Financial intermediaries as defined in the Banking Act of 8 November 1934 (BankA), the Financial Institutions Act of 15 June 2018 (FinIA) and the Collective Investment Schemes Act of 23 June 2006 (CICA) (Art. 4 para. 3 let. a and para. 4 FinSA);
 - b. Insurance companies as defined in the ISA (Art. 4 para. 3 let. b and para. 4 FinSA);
 - c. Foreign clients subject to prudential supervision as the persons listed under a) and b) above (Art. 4 para. 3 let. c and para. 4 FinSA);
 - d. Central banks (Art. 4 para. 3 let. d and para. 4 FinSA);
 - e. national and supranational public entities with professional treasury operations¹ (Art. 4 para. 4 FinSA).
- **Institutional Clients by Exercising an Option pursuant to Art. 5 paras. 3 and 4 FinSA:** Clients who have expressly declared that they wish to be treated as institutional clients pursuant to Art. 5 paras. 3 or 4 FinSA.

b. Consequences of Classification as Institutional Client

Classification as an institutional client means:

- The information, documentation and accountability obligations under FinSA do not apply;
- The Financial Institution would not be required to apply the transparency and due diligence requirements for client orders under FinSA. However, the Financial Institution basically applies the same requirements as for professional clients;
- Institutional clients are considered qualified investors within the meaning of the CISA. Qualified investors may invest in Swiss collective investment schemes that are subject to a simplified authorization and approval process and are exempt from certain investor protection requirements, and/or in foreign collective investment schemes that are not authorized for offering to non-qualified investors in Switzerland and are therefore not subject to supervision by the Swiss Financial Market Supervisory Authority 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 organization and/or legal structure, investor rights or investment policy/restrictions.

c. Possibility to Request a Change of Classification

Per se institutional clients can declare in writing to the Financial Institution that they wish to be classified as professional clients and benefit from the increased client protection associated with this (opting-in).

Institutional clients exercising an option pursuant to Art. 5 para. 3 FinSA may revoke their opting-out at any time in order to be reclassified as professional clients and to benefit from the associated increased client protection.

4.3

Professional Clients**a. Classification as Professional Client**

Classified as professional clients are:

- **Per se Professional Clients:**
 - a. Public entities with professional treasury operations¹ (Art. 4 para. 3 let. e FinSA);
 - b. occupational pension schemes with professional treasury operations and other occupational pension institutions providing professional treasury¹ (Art. 4 para. 3 let. f FinSA);
 - c. Companies with professional treasury operations¹ (Art. 4 para. 3 let. g FinSA);
 - d. Large companies (Art. 4 para. 3 let. h in connection with para. 5 FinSA);
 - e. private investment structures with professional treasury operations created for high-net-worth retail clients¹ (Art. 4 para. 3 let. i FinSA).
 - **Professional Clients by Exercising Choice:**
 - a. by means of an opting-out declaration: High-net-worth retail clients and private investment structures created for them may declare that they wish to be treated as professional clients pursuant to Art. 5 paras. 1 and 2 FinSA;
 - b. by means of an opting-in declaration: institutional clients who have expressly declared that they wish to be treated as professional clients pursuant to Art. 5 para. 6 FinSA.
- b. Consequences of Classification as Professional Client**
- Classification as professional client means:
- The Financial Institution will apply the information, documentation and accountability requirements under FinSA;

¹ The requirement of professional treasury is fulfilled if the institutional client has permanently entrusted the management of the financial resources to a professionally proven person experienced in the financial sector within or outside his organization.

- The Financial Institution will apply FinSA's transparency and client order due diligence requirements;
- Professional clients pursuant to Art. 4 para. 3 FinSA or to Art. 5 paras. 1 and 4 FinSA are considered qualified investors within the meaning of the CISA. Qualified investors may invest in Swiss collective investment schemes that are subject to a simplified authorization and approval process and are exempt from certain investor protection requirements, and/or in foreign collective investment schemes that are not authorized for offering to non-qualified investors in Switzerland and are therefore not subject to supervision by the Swiss Financial Market Supervisory Authority 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 organization and/or legal structure, investor rights or investment policy/restrictions.
- Possibility to request a change of classification

Per se professional clients pursuant to Art. 4 para. 3 let. f and g FinSA as well as Swiss and foreign collective investment schemes and their management companies that do not already qualify as institutional clients pursuant to Art. 4 para. 3 let. a or c FinSA in conjunction with Art. 4 para. 4 FinSA may declare in writing to the Financial Institution that they wish to be classified as institutional clients (opting out).

Professional clients who are not institutional clients may declare in writing that they wish to be classified as private clients and to benefit from the increased client protection associated with this (opting-in).

4.4

Private Clients

a. Classification as Private Client

Private clients are clients who are not professional clients.

b. Consequences of Classification as Private Client:

Classification as private client means:

- The Financial Institution will apply the information, documentation and accountability requirements under FinSA;
- The Financial Institution will apply FinSA's transparency and client order due diligence requirements;
- With the exception of clients who have a long-term asset management or investment advisory mandate with a Swiss financial intermediary approved by the Swiss Financial Market Supervisory Authority FINMA or a foreign financial intermediary subject to equivalent supervision, who, to the extent of these mandates, are considered qualified investors under CISA,

may not invest in Swiss collective investment schemes for qualified investors and/or in foreign collective investment schemes that are not authorized for offering to non-qualified investors in Switzerland.

c. Possibility to Request a Change of Classification

Private clients may declare in writing to the Financial Institution that they wish to be classified as professional client (opting out).

Such an opting-out pursuant to Art. 5 paras. 1 and 2 FinSA requires that the high-net-worth private clients or private investment structures created for them confirm the fulfillment of the following alternative conditions:

- Necessary knowledge based on personal education and professional experience or on comparable experience in the financial sector to understand the risks of financial instruments. Additional eligible assets of at least CHF 500,000; or
- eligible assets of at least CHF 2 million.

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Adequacy and Suitability

The Financial Institution does not provide investment advice or asset management services to private, professional or institutional clients.

In the case of execution-only services, which the Financial Institution offers only in exceptional cases, and when it acts on the basis of a client instruction, it shall carry out neither an appropriateness nor a suitability test. **This information on the non-performance of an appropriateness or suitability test for execution only transactions is provided here as one-off information and will not be repeated in the future.**

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General Risks of Financial Instruments

Investments in financial instruments involve opportunities but also bear risks. It is important that clients understand these risks before using a financial service.

For this purpose, the Financial Institution refers to the brochure "Risks in Trading with Financial Instruments" of the Swiss Bankers Association (SBA). This brochure can be viewed and downloaded at www.swissbanking.ch. Clients can also obtain a copy of the brochure from their relationship manager upon request. Explanations of the risks associated with individual financial instruments can also be found in documents such as the prospectuses for the individual financial instruments.

In case of any further questions, the clients of the Financial Institution may contact their relationship manager at any time.

The clients' attention is also drawn to the following explanations of the risks associated with the financial services offered:

- 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.
- Risk that the client does not monitor his portfolio or monitors it inadequately.
- Risk as a qualified investor in collective capital investments: Qualified investors have access to forms of collective investment schemes that are open exclusively to qualified investors. 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 with regard 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, in the basic information sheet and the prospectus.

7 Information on Costs

In connection with the provision of financial services, the Financial Institution may incur costs and fees.

Information on the actual costs and fees of the financial services is disclosed in the contractually agreed reports and can also be requested from the relationship manager.

Further information on the costs of the products is provided in Chapter 8.

8 Information on Financial Instruments

Information on financial instruments, in particular on fund products, including information on risks and costs specific to financial instruments, can be found in the relevant documents such as prospectuses, basic information sheets, factsheets, etc., which are available free of charge on our website www.helvetica.com (under "Products").

9 Offered Market Universe

When rendering financial services, the Financial Institution generally offers financial instruments (in particular collective investment schemes) that are issued,

managed, developed, administered or controlled by it. In exceptional cases, however, the Financial Institution may also offer or use products from third party providers.

10 Execution of Orders (Best Execution)

To the extent that the Financial Institution provides financial services to clients subject to FinSA's best execution provisions, it shall ensure that the best possible result is achieved in financial, time and quality terms.

The Financial Institution shall take reasonable steps to achieve the best possible result when executing client orders.

11 Conflicts of Interest

The Financial Institution has implemented and maintains appropriate organizational and administrative measures to prevent or manage conflicts of interest that may arise from the provision of financial services from constituting or giving rise to a risk of damage to the interest of its clients.

A conflict of interest arises where the interests of one party (e.g. the Financial Institution, 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.

The Financial Institution shall manage conflicts of interest appropriately for the nature and scope of its business and shall seek to identify, record, manage, mitigate or disclose conflicts of interest. Where disadvantages for clients cannot be avoided or can only be excluded with disproportionate effort, it shall disclose these in an appropriate manner.

12 Business Affiliations with Third Parties

The Financial Institution is a bank-independent fund management company and is held and controlled by Helvetica Group AG.

If the Financial Institution's relationship with third parties leads to a conflict of interest in connection with the provision of a financial service to clients and such conflict of interest cannot be eliminated or mitigated, it shall inform clients of this in an appropriate manner.

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Compensation from Third Parties

The Financial Institution shall endeavor to provide financial services in such a way that it does not receive any compensation from third parties.

If compensation from third parties is nevertheless received, it is passed on to the clients periodically and in an appropriate form.

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**Complaints Management/
Mediation Procedure**

Ensuring client satisfaction is a priority.

If clients are not satisfied with the services of the Financial Institution, they can send an e-mail to office@helvetica.com.

In order to process the inquiry or complaint efficiently and quickly, the full name and contact details and, in as much detail as possible, the reason for the inquiry or complaint, together with any relevant documents, are required. Additional documents may be required to verify the client's identity.

The Financial Institution will acknowledge receipt of the inquiry or complaint and send a response to the inquiry or complaint as soon as possible.

If the reply is not satisfactory and the client therefore wishes to initiate a mediation procedure, he/she may contact the OFS Ombud Finances Switzerland:

OFS Ombud Finances Switzerland

16, Boulevard des Tranchées

CH-1206 Geneva

Telephone: +41 22 808 04 51

E-Mail: contact@ombudfinance.ch

Website: www.ombudfinance.ch

OFS is a free and neutral ombudsman service. As a rule, OFS only becomes active after the Financial Institution has received a written client complaint and has had the opportunity to respond to it.

Disclaimer

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This FinSA Client Information Document is not intended for use by any person or entity who is a citizen or resident of, or licensed to do business in, any jurisdiction where its distribution, publication, availability or use would be contrary to law or regulation.

Despite careful review, the Financial Institution does not warrant the adequacy, accuracy, completeness or correctness of the contents of this FinSA Client Information Document.

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