

FIDLEG Client Information Document

1. Introduction

The purpose of this FIDLEG Client Information Document is to inform you about how Swiss Rock Asset Management AG (hereinafter "SWISS ROCK", "we" or "us") will apply certain requirements of the Federal Financial Services Act ("FIDLEG") as of January 1, 2022.

The FIDLEG regulates the provision of financial services and the offering of financial instruments and aims to strengthen the protection of clients¹. In terms of content, the FIDLEG closely follows the European regulatory reforms and essentially covers the following areas:

- Increasing customer protection
- Transparency in connection with financial products
- Organizational requirements for the provision of financial services.

The introduction of the FIDLEG led to more extensive information and documentation requirements for financial service providers in Switzerland who offer financial services in connection with financial instruments (e.g. asset management, investment advice and the acquisition or sale of financial instruments). In addition, the organizational measures to be taken by financial service providers were expanded.

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

This FIDLEG client information document provides you with an overview of SWISS ROCK's implementation of the FIDLEG rules of conduct. It supplements any contractual agreement between you and SWISS ROCK. In case of contradictions, the respective contractual agreement takes precedence.

2. About Swiss Rock Asset Management

SWISS ROCK is a licensed fund management company under the Swiss Federal Law on Financial Institutions ("FINIG").

As a fund management company, we are subject to the provisions of FINIG, FIDLEG and the Swiss Federal Act on Collective Investment Schemes ("CISA"), among others.

We manage various contractual investment funds under Swiss law, act as Swiss agent and distributor for SWISS ROCK funds under foreign law, provide asset management services for Swiss and foreign collective

investment schemes as well as individual asset management and investment advisory services for other professional and institutional clients as well as for private clients.

For more information about our services, please contact your account manager or contact us at:

Swiss Rock Asset Management AG

Rigistrasse 60
CH-8006 Zurich
Switzerland
Phone: +41 44 360 57 00
E-mail: info@swiss-rock.ch

3. Supervisory authority

SWISS ROCK is licensed and prudentially supervised by the Swiss Financial Market Supervisory Authority FINMA.

Contact details:

Swiss Financial Market Supervisory Authority FINMA

Laupenstrasse 27CH-3003
BernSwitzerlandPhone: +41 31 327 91 00
E-mail:
info@finma.chWebsite: www.finma.ch

4. Customer segmentation

4.1 General information

According to the FIDLEG, all financial service providers are required to allocate their clients to one of the following three segments: Private clients (retail), professional clients and institutional clients.

Each segment is assigned a different level of investor protection (e.g. with regard to information obligations, suitability and appropriateness obligations, documentation and accountability obligations).

Before we provide financial services to you, we will segment you based on the information we have. Subsequently, we will inform you about your segmentation as a professional, or institutional client or retail client.

You can change your segmentation by declaring an opting-in or opting-out, which also changes the level of customer protection and conduct obligations for the customer relationship. Your customer advisor will be happy to explain the available opting-in and/or opting-out options in detail. The declaration of an Opting-In or Opting-Out is only legally binding for SWISS ROCK

¹ Since Swiss Rock predominantly provides financial services to professional and institutional clients and these clients are mainly legal entities, the masculine form is used in the following instead of the paired form in this FIDLEG client information document.

after corresponding written confirmation to the customer.

Any segmentation made by SWISS ROCK will generally apply to all financial services we offer or provide to you, unless you have expressly instructed us otherwise in writing.

We request that you inform us of any relevant changes in the circumstances underlying your segmentation that result in you no longer meeting the necessary requirements for classification as a professional, institutional or retail customer or if you wish to cancel your opting-in or opting-out declaration.

As soon as we become aware on our part that you no longer meet the criteria for your original classification, we will adjust your classification and inform you accordingly. In these cases, SWISS ROCK is entitled to return, exchange or sell all financial instruments that may only be held by clients of the original classification, to terminate contracts for financial services or to discontinue the provision of financial services in the future.

4.2 Institutional customers

a. Classification as institutional customer

Classified as institutional customers are:

- **Per se institutional clients within the** meaning of Art. 4 para. 4 FIDLEG:
 - a. Financial intermediaries under the Banking Act of 8 November 1934 (BankA), the Financial Institutions Act of 15 June 2018 (FINIG) and the Collective Investment Schemes Act of 23 June 2006 (CISA) (Art. 4 para. 3 let. a and para. 4 FIDLEG);
 - b. Insurance undertakings under the Insurance Supervision Act of 17 December 2004 (ISA) (Art. 4 para. 3 let. b and para. 4 FIDLEG);
 - c. foreign clients who are subject to prudential supervision such as the persons referred to in letters a) and b) above (Art. 4 para. 3 let. c and para. 4 FIDLEG);
 - d. central banks (Art. 4 para. 3 let. d and para. 4 FIDLEG);
 - e. national and supranational public-law entities with professional treasury operations²(Art. 4 para. 4 FIDLEG).
- **Institutional clients by exercising an option** pursuant to Art. 5 para. 3 and 4 FIDLEG: Clients who have expressly stated that they wish to be treated as institutional clients pursuant to Art. 5 para. 3 or 4 FIDLEG.

b. Consequences of classification as an institutional customer

Classification as an institutional customer means that:

- the information, documentation and accountability obligations under FIDLEG do not apply;
- SWISS ROCK does not conduct a suitability or appropriateness test when providing investment advisory or asset management services;
- SWISS ROCK would not be required to apply the transparency and due diligence requirements for client orders under FIDLEG. However, SWISS ROCK 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 procedure 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.

SWISS ROCK may, at its sole discretion and on a voluntary basis, apply the FIDLEG Conduct Obligations in whole or in part to financial services provided to institutional clients. Such voluntary application of the Conduct Obligations shall not result in a general obligation of SWISS ROCK to comply with these FIDLEG Conduct Obligations with respect to institutional clients in the future, unless expressly provided for by regulatory provisions.

c. Possibility to request a change of classification

Per se institutional clients may declare in writing to SWISS ROCK that they wish to be classified as professional clients and benefit from the associated increased client protection (opting-in).

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

4.3 Professional clients

a. Classification as a professional client

Classified as professional clients are:

- **Per se professional clients:**
 - a. Public law entities with professional treasury operations³(Art. 4 para. 3 let. e FIDLEG);

² The professional treasury requirement is met if the institutional client has entrusted, on a permanent basis, within or outside its organization, a professionally qualified person experienced in the financial field with the management of financial resources.

³ The professional treasury requirement is met if the customer has entrusted, on a permanent basis, within or outside its organization, a professionally qualified person experienced in the financial field with the management of financial resources.

- b. pension institutions and institutions which, according to their purpose, serve occupational pension plans, with professional treasury services³ (Art. 4 para. 3 let. f FIDLEG);
 - c. Companies with professional treasury operations³ (Art. 4 para. 3 let. g FIDLEG);
 - d. large companies (Art. 4 para. 3 let. h in conjunction with para. 5 FIDLEG);
 - e. private investment structures with professional safekeeping established for wealthy private clients³ (Art. 4 para. 3 let. i FIDLEG).
- **Professional clients by exercising choice:**
- a. by means of an **opting-out declaration**: wealthy private clients and private investment structures created for them who have expressly declared that they wish to be treated as professional clients pursuant to Art. 5 paras. 1 and 2 FIDLEG;
 - 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 FIDLEG.

b. Consequences of classification as a professional client

The classification as a professional client means that

- SWISS ROCK will apply the information, documentation and accountability obligations under FIDLEG;
- SWISS ROCK will only perform a limited suitability or appropriateness test when providing investment advisory or asset management services;
- SWISS ROCK will apply the transparency and due diligence requirements for client orders according to FIDLEG;
- Professional clients within the meaning of Art. 4 para. 3 FIDLEG or according to Art. 5 para. 1 and 4 FIDLEG are qualified investors according to CISA. Qualified investors may invest in Swiss collective investment schemes that are subject to a simplified authorization and approval procedure 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 professional clients may declare in writing to SWISS ROCK that they wish to be classified as institutional clients (opting out).

Professional Clients may request to change their segmentation to Retail Client and accordingly benefit from the rights and protection granted to Retail Clients (opting-in).

4.4 Private customers

a. Classification as private customer

Private customers are customers who are not professional customers.

b. Consequences of classification as a private customer

Classification as a private customer means that:

- SWISS ROCK will apply the information, documentation and accountability obligations under FIDLEG;
- SWISS ROCK will conduct a suitability or appropriateness review when providing investment advisory or asset management services;
- SWISS ROCK will apply the transparency and due diligence requirements for client orders according to FIDLEG;
- With the exception of clients who have a permanent asset management or investment advisory mandate with a Swiss financial intermediary or an equivalently supervised foreign financial intermediary authorized by the Swiss Financial Market Supervisory Authority FINMA, who are considered qualified investors under CISA to the extent of these mandates, private clients 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 SWISS ROCK that they wish to be classified as professional clients (opting out).

Such an opting-out pursuant to Art. 5 paras. 1 and 2 FIDLEG requires that the high net worth private client or private investment structures created for him 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.

5. Adequacy & Suitability

For private clients, SWISS ROCK conducts an appropriateness or suitability test for investment advice, depending on the type of advice, and a suitability test for asset management. In the case of investment advice, SWISS ROCK documents your needs and the reasons for our recommendation and will provide you with the documentation upon request.

The FIDLEG requires financial service providers that provide investment advisory or asset management services to professional clients to undergo only a limited appropriateness or suitability test.

In the case of professional customers, SWISS ROCK may generally assume that these customers have the necessary knowledge and experience and that the investment risks associated with the financial service are financially acceptable. In the case of professional clients, we are generally only required to record the investment objectives in the case of asset management services or investment advice, taking into account the client portfolio (portfolio-based investment advice).

In this context, SWISS ROCK relies on the information provided by you or the person authorized by you. You or your authorized representative(s) are obligated to notify SWISS ROCK immediately of any change in circumstances that may require a change or update with respect to adequacy or suitability.

For institutional clients, we are not required to, and will not, conduct an adequacy or suitability review.

For Execution Only trades and when we act on your instructions, we do not perform a suitability or appropriateness test. **This information about the non-performance of a suitability or appropriateness test for Execution Only transactions is provided here as one-time information and will not be repeated for future Execution Only transactions.**

6. General risks of financial instruments

Investing in financial instruments involves opportunities, but also risks. It is important that you understand these risks before you use a financial service.

For this purpose, the brochure "Risks in Trading with Financial Instruments" published by the Swiss Bankers Association (SBA) is made available on our website www.swiss-rock.ch. You can also obtain a copy of the brochure from your client advisor on request.

Please read this information carefully. If you have any questions, please contact your customer advisor.

7. Cost information

In connection with the provision of financial services, costs and fees may be incurred both by SWISS ROCK and by third parties (e.g. through third-party financial instruments in your portfolio). We distinguish between costs and fees that are charged to you directly and indirect costs in connection with holding financial instruments (e.g. ongoing fees).

Information about the actual costs and charges of your financial services will be disclosed in the contracted reports and may also be requested from your Relationship Manager.

For more information on the cost of our products, see Chapter 8 below.

8. Products information

Information on fund products, including information on product-specific risks and costs, can be found in the respective fund documents, which are available free of charge on our website www.swiss-rock.ch.

If you do not find the product-specific information you are looking for on the website, please contact your account manager or contact us at the address above.

9. Market supply considered

When providing financial services, SWISS ROCK generally offers financial instruments (namely collective investment schemes) that are issued, developed, managed or controlled by it. In exceptional cases, however, SWISS ROCK may also offer or use products from third party providers.

10. Execution of orders (Best Execution)

When executing customer orders, we ensure that the best possible result is achieved in financial, time and quality terms.

We have taken all reasonable precautions to obtain the best possible result when we execute transactions in financial instruments for you through third-party brokers.

SWISS ROCK has a framework for the management and execution of orders. This framework covers all asset management activities, which include the administration of orders and the execution of transactions up to the allocation of executed orders.

The framework and regulations for order management and execution are regularly reviewed for completeness and effectiveness.

We generally apply the same best execution principles to all of our customers unless a customer specifically instructs us otherwise.

11. Conflicts of interest

SWISS ROCK has implemented appropriate organizational and administrative measures to prevent or manage any conflicts of interest that may arise from the provision of financial services that could pose a risk to the interests of our customers or result in a disadvantage.

A conflict of interest arises when the interests of one party (e.g. SWISS ROCK or a member of the Board of Directors or an employee or a customer) do not coincide or might not coincide in the future with the interests of another party. As a result, one party may be disadvantaged to the advantage of the other party.

Our conflict of interest policies and framework, which are appropriate to the nature and scale of our business, enable us to identify, record, manage, mitigate or disclose conflicts of interest. Where disadvantages for customers cannot be excluded or can only be excluded with disproportionate effort, we will disclose this to you in an appropriate manner.

Please contact us if you have any questions about our policies and conflict of interest framework.

12. Economic ties to third parties

SWISS ROCK is a bank-independent fund management and asset management company and is owned and controlled by Swiss Wealth and Asset Partners AG. If SWISS ROCK's relationship with third parties results in a conflict of interest in connection with the provision of a financial service to you and such conflict of interest cannot be eliminated or mitigated, we will notify you appropriately.

13. Compensation from third parties

As a matter of principle, SWISS ROCK endeavors to provide its financial services and the use of its collective investment schemes in such a way that SWISS ROCK does not receive any compensation from third parties.

Should compensation from third parties nevertheless be incurred, SWISS ROCK shall pass on such compensation, which it receives from third parties in connection with the offering of collective investment schemes or the acquisition thereof for its customers, to its customers periodically and in an appropriate form.

14. Complaint management / mediation procedure

Ensuring customer satisfaction is our priority.

We value your feedback and take every comment and complaint seriously.

If you are not satisfied with our services, please email us at info@swiss-rock.ch.

We handle all inquiries and complaints in accordance with our legal obligations and internal procedures. In order to process your inquiry or complaint efficiently and quickly, we need your full name and contact details and, in as much detail as possible, the reason for your inquiry or complaint, together with any relevant documents.

We will acknowledge receipt of your inquiry or complaint and will send you a response to your inquiry or complaint as soon as possible.

If you submit an inquiry or complaint to us, we may request additional information from you that we need to verify your identity.

If our response is not satisfactory to you and you therefore wish to initiate mediation proceedings, you may contact the Swiss Financial Ombudsman Service (FINOS) ("FINOS"):

Financial Ombudsman Service Switzerland (FINOS)

Talstrasse 20

CH-8001 Zurich

Switzerland

Phone: +41 44 552 08 00

E-mail: info@finos.ch

Website: www.finos.ch

FINOS is a free and neutral ombudsman service. As a rule, FINOS only becomes active after SWISS ROCK has received a written customer complaint and has had the opportunity to respond to it.

Legal Information:

This FIDLEG Client Information Document is provided to you for informational and regulatory purposes only and is intended to provide you with an overview of how SWISS ROCK implements the legal conduct requirements.

Despite careful review, SWISS ROCK assumes no liability for the adequacy, accuracy, completeness or correctness of the contents of this FIDLEG Client Information Document.

This FIDLEG Customer Information Document reflects the status as of January 1, 2022 and can be updated by SWISS ROCK at any time unilaterally and without further notice to the customer. You will always receive the current version of the FIDLEG client information document from your client advisor. After January 1, 2022, the current version of the FIDLEG Client Information Document can be downloaded from our website www.swiss-rock.ch.

This FIDLEG Client Information Document does not constitute an offer or solicitation by SWISS ROCK to use any service, to buy or sell any financial instrument, or to participate in any particular trading strategy in any jurisdiction.