

FINANCIAL SERVICES ACT (FINSA) INFORMATION OBLIGATION

Swiss Financial Services Act (FinSA)

The new Swiss Financial Services Act (FinSA) and its implementing ordinance (FinSO) entered into force on the 1st of January 2020.

This Act seeks to protect the clients of financial service providers and to establish comparable conditions for the provision of financial services by financial service providers, and thus contributes to enhancing the reputation and competitiveness of Switzerland's financial centre. To this end, it establishes the requirements for honesty, diligence and transparency in the provision of financial services and governs the offering of financial instruments. We have put together below some important information for you as a client below.

Information about Triatlum Advisors AG

Triatlum Advisors AG is an authorized asset manager under the Swiss Financial Market Supervisory Authority (FINMA) and supervised by the AOOS (*Schweizerische Aktiengesellschaft für Aufsicht*), a FINMA recognized supervisory organization. Due to its membership to the AOOS, the Advisor is obliged to adhere to the professional standards and the statutory duties of care and conduct; they correspond to official requirements and are approved by FINMA.

Triatlum Advisors is incorporated as a limited company under Swiss law in the Commercial Register of the Canton of Schwyz. It has a branch in Geneva.

Contact details

Registered address:

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Triatlum's Investment Universe

Triatlum Advisors AG is an investment management and advisory firm specializing in bespoke multi-asset-based strategies:

Fixed Income	Long-term preservation of assets Return: ongoing interest earnings Minimum volatility of capital
Income	Long term preservation / moderate growth of assets Return: primarily from ongoing interest and dividend earnings coupled with modest capital gains Low volatility of capital
Balanced	Long-term asset growth Return: from ongoing interest and dividend earnings as well as from capital gains Medium volatility of capital
Growth	Long-term maximization of asset growth Return: mainly from capital gains, coupled with very low ongoing interest and dividend earnings High volatility of capital

Capital Gain Maximization of asset growth
Return: from capital gains
Very high volatility of capital

Bespoke Multi-Asset Tailor-made solution offered to portfolios holding assets above CHF 5mio equivalent.

Discretionary Asset Management: on the basis of an asset management mandate, the client entrusts Triatum with the management of his/her assets. Triatum exercises the mandate at its own discretion within the framework of its investment policy, but in accordance with the investment strategy chosen by the client and any instructions from the client. For this type of mandate, Triatum takes the investment decisions. Throughout the life of the mandate, Triatum verifies that the strategy chosen by the client is in line with the risk level of the client's portfolio.

Investment advice:

a) Global investment advice (Investment Advisory and Portfolio Supervision Mandate): Triatum provides this service within the framework of an investment advice mandate taking into account the client's entire portfolio. For this type of service, Triatum recommends one or more financial instruments, and the client makes the final investment decision. Throughout the life of the mandate, Triatum verifies the appropriateness of the strategy chosen by the client and the level of risk of the client's portfolio.

b) Investment Advisory on Individual Transactions Mandate: for this type of service, Triatum recommends one or more financial instruments, and the client makes the final investment decision. Triatum verifies the appropriateness of its recommendations. Triatum does not carry out any subsequent monitoring.

Execution of orders (Execution Only Mandate): the client gives an order to buy or sell a financial instrument and Triatum executes it either directly (acquisition or disposal of financial instruments) or via another financial institution (reception and transmission of orders for financial instruments). Triatum does not issue any personalized recommendations: the client alone makes the investment decision without any advice being provided by Triatum.

Definition of Financial Services under FinSA

FinSA defines the following activities carried out for clients as financial services:

- the purchase or sale of financial instruments;
- the receipt and transmission of orders in relation to financial instruments;
- portfolio management;
- providing personal recommendations relating to transactions in financial instruments (investment advice);
- facilitation of loans for the purpose of executing transactions in financial instruments.

Client categorization & change in categorization

FinSA requires that financial services providers classify their clients in either of the following categories:

Institutional clients:

- a financial intermediary within the meaning of the BA, the FinIA and the CISA
- an insurance company specified by the ISA
- a foreign client subject to prudential supervision like the persons listed above
- a central bank
- a national and supranational public entity with a Professional treasury operation

Professional clients:

- a public entity with a Professional treasury operation
- an occupational pension scheme or other institution whose purpose is to serve occupational pensions with a Professional treasury operation
- a company with a Professional treasury operation
- a large company
- a Retail investment structure with a Professional treasury operation created for high-net-worth clients.

Non-Professional or non-Institutional clients are considered as Retail clients (Private clients).

Professional and Institutional clients per se will be considered as qualified investors according to the Collective Investment Schemes Act (CISA). Retail clients with discretionary portfolio management mandates and advisory mandates will also be considered qualified investors under CISA.

Clients may declare in writing that they wish to opt out (reduce their regulatory protection) or, alternatively, opt in (increase their regulatory protection).

Retail clients may declare that they wish to be categorized as elective Professional investors (opting out), provided that the below criteria laid down by the regulations are met:

- the clients have at their disposal bankable assets of at least CHF 2 million,

or,

- the clients have at their disposal bankable assets of at least CHF 500,000, and on the basis of education and Professional experience or on the basis of comparable experience in the financial sector, the clients possess the necessary knowledge to understand the risks associated with the investments.

Occupational pension schemes and other institutions whose purpose is to serve occupational pensions with Professional treasury operations and companies with Professional treasury operations may declare in writing that they wish to be categorized as Institutional clients (opting out). On the other hand, all Professional clients may declare in writing that they wish to be categorized as Retail clients (opting in).

Institutional clients may declare in writing that they wish to be categorized as Professional clients (opting in).

Information on risks involved in trading financial services instruments

Transactions with financial instruments are associated with opportunities and risks. It is therefore important that you are familiar with and understand these risks before using a financial service.

The brochure "Risks Involved in Trading Financial Instruments" contains general information on financial services and on the characteristics and risks of financial instruments.

ASB - Risks Involved in Trading Financial Instruments

Best execution of client's orders

An objective of the FinSA is to safeguard the principle of best execution of orders when trading in financial instruments. Triatlum Advisors AG has taken all the necessary steps to ensure that the transmission and execution of orders are performed in accordance with best-execution rules.

Cost information

Triatlum Advisors AG informs its clients of the costs associated with the financial services it provides, and this information is made available by the advisor at the time the service is provided, and at any time upon request.

Conflicts of interest

Conflicts of interest may occur when business interests are contrary to one another. If not mitigated, they may result in a financial disadvantage for our clients. Triatlum Advisors AG has included in its Code of Conduct a policy to address actions and set forth processes to identify and manage conflicts of interest.

Mediation body

Swiss regulations provide that financial services provider must be affiliated to a mediation body. Disputes between a financial services provider and a client can therefore be settled by way of mediation. The mediation proceedings are meant to be straight forward, fair, quick, impartial, and inexpensive or free of charge for the client.

Triatlum Advisors AG is affiliated to the following mediation body:

OFS Ombud Finance Switzerland
10 rue du Conseil-Général
1205 Geneva, Switzerland
www.ombudfinance.ch