

## 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 1<sup>st</sup> 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.

### **Information about Triatum Advisors AG**

Triatum 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.

Triatum is audited by the auditing company PwC both in terms of regulatory law and obligations. The address of the supervisory organization and the auditing company can be found below:

Supervisory organization:

AOOS – Schweizerische Aktiengesellschaft für Aufsicht  
Clausiusstrasse 50  
8006 Zürich

Audit firm:

PwC Zürich  
Birchstrasse 160  
8050 Zürich

Triatum 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:**  
Triatum Advisors AG  
Sihleggstrasse 23  
8832 Wollerau  
Switzerland

**Geneva Branch:**  
Triatum Advisors AG  
Galerie Jean-Malbuisson 15  
1204 Geneva  
Switzerland

**Phone: +41 (0) 22 311 5232**  
[admin@triatlum.com](mailto:admin@triatlum.com)

### **Triatum's Investment Universe**

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

<b>Fixed Income</b>	Long-term preservation of assets Return: ongoing interest earnings Minimum volatility of capital
<b>Income</b>	Long term preservation / moderate growth of assets Return: primarily from ongoing interest and dividend earnings coupled with modest capital gains Low volatility of capital
<b>Balanced</b>	Long-term asset growth Return: from ongoing interest and dividend earnings as well as from capital gains Medium volatility of capital
<b>Growth</b>	Long-term maximization of asset growth Return: mainly from capital gains, coupled with very low ongoing interest and dividend earnings High volatility of capital
<b>Capital Gain</b>	Maximization of asset growth Return: from capital gains Very high volatility of capital
<b>Bespoke Multi-Asset</b>	Tailor-made solution offered to portfolios holding assets above CHF 5mio equivalent.

### **Information on the offered financial services**

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.

This brochure can also be found at [www.swissbanking.ch](http://www.swissbanking.ch)

### **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.

### **Information about relationships with third parties**

In connection with the financial services offered by the financial institution, economic ties may exist with third parties. The acceptance of payments from third parties as well as their treatment are regulated in detail and comprehensively in the respective investment advisory and portfolio management contracts.

### **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](http://www.ombudfinance.ch)

### **Changes on this FinSA Information Obligation**

Triatlum may amend this FinSA Client Information at any time without prior notice. The current version published on our website shall apply.