Client Information FinSA

Domicile outside of the European Union (EU)

Information about VENTIRA Private Wealth Management Ltd.

VENTIRA Private Wealth Management Ltd. (hereinafter referred to as „VENTIRA“) offers asset management, investment advisory and execution-only services and has its registered office at: Genferstrasse 23 in CH-8002 Zurich. VENTIRA is registered as corporation in the Swiss Commercial Register.
VENTIRA is licensed and registered as an asset manager by the Swiss Financial Market Supervisory Authority (FINMA), supervised by it in accordance with the Federal Financial Institutions Act (FinIA) with involvement of

Postal address:	OSFINcontrol AG Aufsichtsorganisation Finanzdienstleister General-Guisan-Strasse 6, CH-6300 Zug
Phone:	+41 41 767 36 00
E-mail:	info@osfincontrol.ch
Webpage:	www.osfincontrol.ch

a supervisory organization. The provision of financial services by VENTIRA is subject to the Federal Financial Services Act (FinSA).

How can I contact VENTIRA?

The client can communicate with VENTIRA in German, English and French. VENTIRA can be reached as follows:

Postal address:	VENTIRA Private Wealth Management Ltd. Genferstrasse 23, CH-8002 Zurich
Phone:	+41 41 748 2290
E-mail:	info@ventira.ch
Webpage:	www.ventira.ch or www.ventira.swiss

Further details on the communication between the parties are regulated individually by contract.

What are the terms and conditions of the services provided by VENTIRA?

The rights and obligations between VENTIRA and the client in connection with the provision of financial services shall be governed by the individual service agreement. This client information serves as supplementary information.

In which categories are the clients classified?

VENTIRA is obliged to classify the client as a retail client, professional client or institutional client. The scope of the individual conduct duties of VENTIRA varies depending on the client segment. New clients are informed about their classification and existing clients are only informed about a change of their existing classification.

Retail Client

A retail client is considered to be one who cannot be clearly assigned to the professional client or institutional client category. By being classified as a retail client, the client enjoys the highest level of protection.

Professional clients are:

- Pension funds and institutions which, according to their purpose, serve the purpose of occupational pension provision, with professional treasury;
- Companies with professional treasury;
- Large companies;
- Private investment structures with professional treasury for wealthy retail clients.

A professional client has a lower level of protection than a retail client. In particular, VENTIRA may assume for a professional client that the acting persons have sufficient experience, knowledge and expertise to make investment decisions and to adequately assess the associated risks and that the risks associated with the investment decisions are financially bearable for the client. In addition, professional clients may release VENTIRA from applying the rules of conduct pursuant to Art. 8, 9, 15 and 16 FinSA (information, documentation and rendering of account obligations).

Institutional Clients

Institutional clients are regulated legal entities such as financial intermediaries under the Banking Act (BA), the Financial Institutions Act (FinIA) and the Collective Investment Schemes Act (CISA), insurance companies under the Insurance Supervision Act (ISA); foreign clients subject to equivalent prudential supervision; central banks and national and supranational public corporations with professional treasury.
Institutional clients benefit from the lowest level of protection. The rules of conduct pursuant to Art. 7 to 19 FinSA per se do not apply to this client category.

Reclassification

At any time retail clients may request VENTIRA in writing to change their client classification to the category of professional client if they meet at least one of the following criteria:

- The client has the necessary knowledge to understand the risks of the investments, based on personal training and professional experience or comparable experience in the financial sector, and has assets of at least CHF 500,000;
- The client has assets of at least CHF 2 million.
- Pension institutions and institutions with professional treasury which, according to their purpose, serve the purpose of occupational pension provision and companies with professional treasury may declare that they wish to be regarded as institutional clients instead of professional clients;
- Professional clients have the option to request a reclassification as private client;
- Institutional clients may declare that they wish to be considered professional clients.

Such a change also entails a change in the level of protection applicable to the client.
All declarations with regard to the change of client segment must always be made in writing.
The client is obliged to inform VENTIRA of any changes that might affect his classification. If VENTIRA realises that the client no longer meets the conditions of the client segment he is classified, VENTIRA is obliged to take action itself and adjust the client segmentation. In this case VENTIRA will inform the client immediately.

Which services are offered?

Asset Management

Asset management is offered to clients who wish to entrust VENTIRA with the discretionary management of their assets within the framework of the VENTIRA investment policy as well as individually defined and written criteria (investment strategy). The investment strategy considers the knowledge and experience of the client as well as the investment objectives and financial circumstances of the client. With an asset management agreement, VENTIRA is authorised to make investments at its own discretion.

Portfolio Advisory

Portfolio Advisory service is similar to the discretionary portfolio management service but requires Client consent before VENTIRA may effectuate any securities transaction. VENTIRA provides portfolio advice and trading recommendations but all decisions regarding the investment of the Account reside with the Client. This service is designed for Clients who desire holistic management of their Account but who want to retain involvement in every investment decision. As a result, Clients under this service offering may not be invested in the same manner as those Clients with the Discretionary Portfolio Management service.

Investment Advisory

Investment Advisory service permits Clients to consult with VENTIRA from time to time on the Client's specific investment questions pertaining to individual investment opportunities as identified by the Client. VENTIRA provides its advice concerning the merits of particular investments (i.e.,

whether to purchase or sell a security). This service offering is designed for Clients who wish to use VENTIRA as a resource when making investment decisions but who desire to retain responsibility for determining the allocation of their investment portfolio. VENTIRA does not monitor the overall risk of the Client's Account. Ultimate responsibility for the investment of the Client's Account rests solely with the Client.

What is the test for suitability and appropriateness?

The suitability and appropriateness test by VENTIRA is based on the information provided by the client which is deemed by VENTIRA to be accurate. If the client does not provide the requested information and data or only provides it insufficiently, VENTIRA is not able to provide the services to the client in an appropriate manner.

Suitability Test

In connection with portfolio-based-investment advice or asset management, VENTIRA must obtain various information from the client. This includes - as far as relevant - information on:

- The client's knowledge and experience in relation to the agreed financial service;

- The client's investment objectives, including:
  Information on the time horizon and purpose of the investment, the client's risk willingness and any investment restrictions;
- The financial circumstances of the client;
- Information on the nature and amount of the client's regular income, assets and current and future financial obligations.

Based on this information, VENTIRA draws up a risk profile with and agrees on an investment strategy for the client.

Appropriateness Test

In the case of transaction-based investment advice, VENTIRA must check whether the investment recommendations are appropriate for the client considering its knowledge and experience. In order to do so, VENTIRA must obtain information on the client's knowledge and experience with financial instruments.

Presumption for Professional Clients

If a client is classified as a professional client, VENTIRA assumes that the client has the necessary knowledge and experience and that the financial risks associated with the investment decisions or recommendations are bearable for the client.

Proxy Relationship and Joint Accounts

In assessing the knowledge and experience of legal persons or in the case of a power of attorney, VENTIRA focuses on the person acting vis-à-vis VENTIRA. If the authorised person is only collectively authorised to sign, all persons concerned must have the necessary knowledge and experience. When assessing financial circumstances and investment objectives, VENTIRA always focuses on the account holder. In the case of an account with two or more account holders, VENTIRA always focuses on the person with the weakest financial circumstances or the lowest risk capacity.

Which market offer does VENTIRA consider when selecting financial instruments?

The investment universe considered when making investment recommendations or investment decisions by VENTIRA is determined by all common banking financial instruments without geographic restrictions. The investment universe of VENTIRA includes in particular:

- Buy and sale (spot or with future date/price): Securities and security rights, (book-entry and their derived instruments or combinations), precious metals, commercial papers, currencies, crypto currencies and money market instruments, derivatives (options and futures) and additional financial assets (in particular hedge funds and structured products);
- Conversion as well as execution or sale of subscription rights, conversion rights, exchange rights or something similar and;
- Fixed deposits and fiduciary investments in different currencies;
- All corporate actions (e.g. capital increase, dividends, take-over offer)

Conflicts of Interest – General Principles

VENTIRA tries to protect and harmonize the interests of its clients, shareholders and employees. Nevertheless, conflicts of interest cannot always be completely ruled out. In general, conflicts of interest can arise between VENTIRA, its employees and its clients or between the clients of VENTIRA. In this context, VENTIRA has taken the following organisational measures to deal with possible conflicts of interest:

- Creating of a compliance function within the company responsible for identifying, avoiding and managing potential conflicts of interest;
- Establishment of organizational procedures to safeguard the customer's interest;
- Regulation on the acceptance of benefits from third parties;
- All employees who may have conflicts of interest in the course of their work are identified and are required to disclose all their transactions in financial instruments;
- When executing orders VENTIRA acts in accordance with its Best Execution Policy or the customer's instructions;
- Ongoing training of employees.

Conflicts of interest that cannot be avoided by these measures are disclosed to the client before services are provided.

Business affiliations with third parties in particular

VENTIRA has business affiliations with third parties (custodians, financial intermediaries etc.), which could lead to a conflict of interest in connection with their financial services. The possible conflict of interest is derived from remuneration VENTIRA may receive from third party providers for investments in derivative products VENTIRA is structuring and evaluating the appropriate counter party (structuring fee). The risk for the Client is that such remunerations may have a negative impact on the performance of the selected investment instruments. VENTIRA has taken the following precautions to reduce such risks:

- prior and explicit consent of the Client to the structuring fee;
- limitation of the amount of the structuring fee;
- periodic disclosure of the structuring fees received at the request of the Client.

What costs are incurred?

Various costs arise in connection with the execution of orders given to VENTIRA. VENTIRA charges a management fee or an advisory fee according to the agreed contract. In addition costs are incurred for the provisions of services by third parties, such as fees of the custodian banks (custody fees) or transaction fees (brokerage fees, forex commissions) when trading securities or product related costs in connection with the purchase or sale of financial instruments (issue surcharge etc.).
Upon the Client's request VENTIRA will give detailed information about the costs.

Where can the client turn in the event of a dispute?

VENTIRA always strives to provide the best possible service for its customers. Should the customer nevertheless be dissatisfied with the service provided by VENTIRA, he has the option of initiating a mediation procedure with:

Addresse:	OFD Ombudsstelle für Finanzdienstleister Bleicherweg 10, CH-8001 Zürich
Phone:	+41 44 562 0525
E-mail:	ombudsmann@ofd.ch
Webpage:	www.ofd.ch

FinSA:	Federal Act on Financial Services of June 15, 2018 (SR 950.1)
FinIA:	Federal Act on Financial Institution of June 15, 2018 (SR 954.1)